

## COURSE PROGRAMME

Course Title : Executive Tax Programme Level I (International Tax)

Intake Number : 2 / 2020

Level : Basic

Duration : 3 days (18 CPE Hours)

Course fee: \$695.50  
(fee include GST)

This course is available for skillsfuture credit claim and Union Training Assistance Programme (UTAP) funding. For more information, please visit our website.

Please ensure you have read and understood the [Terms and Conditions](#) for courses.

Recommended for : Participants with little or no knowledge in international tax.

Participants should preferably have 1 to 2 years of relevant experience in domestic tax.

## Overview

Look forward to a new learning experience as we deliver the Level I International Tax to you via virtual classroom. The programme provides basic knowledge in Tax Treaties and Transfer Pricing. Through the virtual classroom, you get to learn, interact with our trainers and reinforce your learning through discussions and case studies.

## Outline

1. Basic Concepts in Tax Treaty
  - Introduction
    - What is a tax treaty?
    - Objective of a tax treaty
    - Concepts on juridical and economic double taxation
    - Interaction between domestic law and tax treaty, including concepts of tax residence, taxing rights and sharing of taxing rights between jurisdiction
  - Standard Treaty Model
    - How is a treaty structured
    - OECD model and UN model (introduction)
  - Key Articles and Terms
    - Scope of treaty – Persons covered and taxes covered
    - Definitions – resident and permanent establishments
    - Taxation of Income : Business profits, dividends, interest & royalties, capital gains, income from employment, Directors' fees, Artistes and sportsmen, pensions, government service etc
    - Methods of elimination of double taxation
2. Singapore treaty networks
  - Singapore treaty model and positions of selected articles
  - Singapore's comments to the OECD model
  - Singapore's treaty network
  - International tax dispute resolution – MAP, APA
  - Singapore's MAP procedures
  - Common treaty issues
  - Case studies on dispute resolution
3. Basic Concepts in Transfer Pricing (TP)
  - Introduction to Transfer Pricing and TP methods
  - Key concepts
    - Arm's Length Principle
    - Comparative analysis
  - Methods
    - Overview of methods
    - Strength and weakness of each method
    - Practical examples

- Documentation
    - What is documentation and why is there a need for TP documentation
    - Concept of contemporaneous documentation
    - What are the common consequences of lack of TP documentation
  - Disputes and risk management
    - TP audits and risk management
    - TP adjustments
    - Dispute resolution (an introduction)
4. Singapore Transfer Pricing Guidelines
    - Background of Singapore TP Guidelines
      - Reference to E-tax guides issued
      - Alignment with OECD TP guidelines
    - Related party lending and routine services 5% safe-harbour
    - Revised Documentation guidance
  5. IRAS Transfer Pricing Consultation (TPC) Program
  6. Future Developments
    - Basic introduction to Base Erosion and Profit Shifting (BEPS)

### **Class Schedule**

- Participants will be required to do pre-reading of materials before the virtual classroom sessions.

<b>Dates</b>	<b>Topic</b>	<b>Trainer</b>
18 Feb 2021 2.00 p.m. to 5.30 p.m.	Singapore Treaty Network	<b>Jimmy Oei</b> Tax Director Acutus Tax Services Pte Ltd
25 Feb 2021 2.00 p.m. to 5.30 p.m. & 26 Feb 2021 9.00 a.m. to 12.30 p.m.	Basic Concepts in Tax Treaty	<b>Chew Wee Ling</b> Group Tax Specialist IRAS
3 & 8 Mar 2021 2.00 p.m. to 5.30 p.m.	Basic Concepts in Transfer Pricing	<b>Sim Tzi Yong Sam</b> Senior Advisor, Vienna University Global Tax Policy Centre
9 Mar 2021 2.00 p.m. to 5.30 p.m.	Singapore Transfer Pricing Guidelines  IRAS Transfer Pricing Consultation (TPC) program	<b>James Yeo Ming Han</b> Manager Taxise Asia Consulting Pte Ltd

### **Virtual Classroom Requirements**

Participants need to have a laptop with internet access, in-built camera in laptop/webcam, Chrome browser and a headset/earpiece with microphone. Participants are to turn on their video throughout the session.

The virtual classroom will be delivered via Canvas and Zoom. Details on the logins will be given to you upon confirmation of the programme.

Canvas and Zoom are both web-based. For Zoom, please download the software to your laptop for easier to navigation to the controls.

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