

COURSE PROGRAMME

- Course Title : **Executive Tax Programme Level II
(International Tax)**
- Intake Number : **1/2019**
- Level : Intermediate
- Recommended for : a) Participants with 1-2 years relevant experience in domestic tax,
and
b) Participants must have basic knowledge of international tax
- Course Fees: 5 days (30 CPE Hours)
- \$1,230.50
(fee listed include GST, course materials and light refreshments)
- Please ensure you have read and understood the [Terms and Conditions](#) for courses.

Overview

This module provides in-depth knowledge in international tax principles and concepts, with focus on specific issues on tax treaty and transfer pricing.

The course will be delivered through a combination of lectures, discussions and case studies to reinforce participants' understanding of tax treaty and transfer pricing principles and concepts.

Outline

1. Transfer Pricing (TP)

- Documentation: Elements of a Transfer Pricing Report. The OECD 3 Tier approach to Documentation: Country-by-Country, Master file and Local file
- Dispute Resolution Part 2: Mutual Agreement Procedures (MAPs) and Advanced Pricing Agreements (APAs)
- Some common areas encountered in practice –
 - Head-office Cost and management fee recharges
 - Financing transactions
- Operational aspects of TP
 - Governance & controls
 - Good implementation of TP through the accounting systems

2. Case study on how to conduct a transfer pricing study

- Toll manufacturer
- Distributor

3. Tax treaty application

- Concept of withholding tax
- Illustrations on the interaction of treaties and domestic tax rules
 - Business profits
 - Interest, dividends & royalties
 - Employment income
 - Foreign tax credit

4. Case studies on interpretation of treaty

5. Recent international tax developments and impact

- Overview of the OECD's BEPS developments
- Highlight of key recommendations and resulting implications
- Unilateral measures
- Permanent establishment
- Prevent treaty abuse – impact of LOB/MPT and implications
- TP documentation – master file and local file (in relation to country-by-country reporting and disclosure of information/greater transparency)
 - Contents
 - Implications

6. Case study on interplay between treaty and transfer pricing
7. Selected countries' tax systems with emphasis on international tax transactions
 - The following countries will be covered:
 - China
 - India
 - Indonesia
 - Key observations, developments and trends
 - Treaty shopping
 - Anti-avoidance rules
 - Case studies

Venue Details

Discovery Training Room, Basement 1, Revenue House, 55 Newton Road

Class Schedule

Date / Day / Time	Module	Lecturer
27 Sep 2019 9.00 a.m. – 4.30 p.m. Aspiration room	Transfer Pricing Case Study – How to Conduct a Transfer Pricing Study	Lee Jingyi Director, Transfer Pricing KPMG Advisory LLP
9 Oct 2019 9.00 a.m. – 4.30 p.m. Aspiration room	Tax Treaty Application	Liew Li Mei Partner, Business Tax Deloitte & Touche LLP
15 Oct 2019 9.00 a.m. – 12 p.m.	Case studies on Interpretation of Treaty	Nico Derksen International Tax Management Pte Ltd
15 Oct 2019 1.30pm to 4.30pm	Selected Countries' Tax Systems <ul style="list-style-type: none"> • China 	Luis Coronado Partner, Transfer Pricing Leader & International Tax Services Ernst & Young Solutions LLP
16 Oct 2019 9.00 a.m. – 4.30 p.m.	Recent International Tax Developments and Impact Case Study	Chester Wee Partner, International Tax Services Ernst & Young Solutions LLP
23 Oct 2019 9.00 a.m. to 4.30 p.m.	Selected Countries' Tax Systems <ul style="list-style-type: none"> • India (morning) • Indonesia (afternoon) 	Gaurav Tanna Associate Director KPMG Advisory LLP Steven Solomon Senior Manager KPMG Services Pte Ltd