

**NATIONAL UNIVERSITY OF SINGAPORE
NUS Business School
Department of Accounting**

ACC4611 Advanced Taxation

Instructor: Associate Professor (Practice) Simon Poh (email: simonpoh@nus.edu.sg)

Session: Semester 2, 2017/2018

Venue: Mon 9 am to 12 pm & 1 pm to 4 pm (BIZ1 / 02 - 04)

Pre-requisites

ACC3605 Taxation

Aim

To build on the foundation in ACC3605 and provide students with basic grounding in tax planning and appreciation of tax issues commonly encountered by businesses and individuals from both the local and international tax perspectives.

Course objectives

- To understand and apply the basic principles of tax planning for business entities in a local (Singapore) context.
- To understand and apply the basic principles of tax planning for business entities in an international context, including the relevance of tax treaties.
- To understand and apply the basic principles of tax planning for an individual employee (Singapore resident) working in both local and cross-border assignments.

Reading References

There is no basic compulsory textbook, as materials are collated from various sources. The following references are useful:

- IRAS website – mainly e-Tax guides and relevant tax treaties
- Ministry of Finance website – past and current year Budgets
- Singapore Big Four websites – mainly Budget Commentaries
- Organisation for Economic Cooperation and Development (OECD) website.

Tax Statutes

Income Tax Act (ITA), Cap. 134 & Economic Expansion Incentives Act (EEIA), Cap 86
Both statutes are available for on-line viewing at <http://statutes.agc.gov.sg>

Assessment & Evaluation (100% Continual Assessment)

Group Assessment

Tutorials and Case Studies 20%

Individual Assessment

Class Participation 20%

Mid-Term Test 30%

Final-Term Test 30%

TOTAL 100%

Detailed Syllabus

1. Local Tax Planning for Business Entities

- Revision of key income tax concepts covered in ACC 3605 Taxation course
- Introduction to tax planning and application of common tax planning techniques
- Selected tax incentives in ITA AND EEIA, including:
 - Headquarters tax incentives
 - Development & Expansion (DEI)
 - Global Trader Programme (GTP)
 - Pioneer Companies / Pioneer Service
 - Investment Allowance
- Transfer Pricing and Anti-Tax Avoidance
- Tax issues in corporate mergers and acquisitions

2. International Tax Planning and Tax Treaties

- Objectives of international tax planning and common tax planning techniques
- Tax issues to consider when a company ventures overseas, including:
 - Choice of investment vehicle
 - Designing a tax efficient holding structure
 - Planning the financing structure
 - Profit repatriation
 - Common Pitfalls to avoid
 - Taxation of foreign income in Singapore (revision)
- Base Erosion and Profit Shifting (BEPS)
- Understanding the role of tax treaties in international tax planning
- OECD Model Tax Convention and Commentaries on various treaty articles
- Selected tax treaties – Malaysia, China and India

3. Individual Tax Planning

- Revision of key individual income tax concepts covered in ACC 3605 Taxation course and additional topics, including:
 - Structuring employment packages
 - Area representatives, dual employment contracts and NOR schemes
- Tax issues to consider when sending staff for overseas assignments, including:
 - Tax equalisation and tax protection policies
 - Relevance of tax treaties