

# CROSS BORDER TAX STRATEGIES

31 OCT 2019 (THUR) • 9AM – 5PM • ISCA HOUSE, SINGAPORE

## OUTLINE

- Structuring Cross Border Investments
  - Developing a regional/global tax structure to lower the group's effective tax rate
  - The use of holding companies in Asia
  - Achieving tax arbitrage in funding cross border investments
  - Withholding tax mitigation strategies
  - Updates on key tax incentives in Asia
- Offshore International Tax Planning
  - General features of several offshore jurisdictions – an update
  - Investment holding, financing, licensing & trading
  - Strategies & common typologies
  - Case study - case of offshore structure in a large multinational operation
- Tax Incentives for Companies Venturing Abroad
  - Financial and tax incentive schemes in Singapore to support internationalization
  - What are their key criteria?
  - Types and taxability of different business entities in ASEAN
  - Cross border tax related issues
- Interpretation & Application of Double Taxation Agreements
  - Principles of double taxation and tax treaties
  - Tax mechanisms for relief under DTAs
  - Tax exemption on foreign sourced income
  - Singapore tax treaty partners and the main features of Singapore DTAs
  - Use of DTAs on withholding taxes
  - Tax treaty planning possibilities
- Managing Transfer Pricing in Asia
  - Regional update of transfer pricing practices
  - Issues and challenges of using Advance Pricing Agreements (APA) in Asia
  - Structuring an appropriate transfer pricing policy in Asia

## TRAINERS' PROFILE

### Ho Kah Chuan – Director, Corporate Tax Advisory, KPMG in Singapore

Kah Chuan is a Tax Director with KPMG in Singapore and has amassed more than 13 years of experience in the areas of tax advisory, tax policy formulation, tax treaty negotiation, tax audit and compliance services. Kah Chuan has assisted many multinationals and local enterprises in solving various tax issues, ranging from corporate tax, personal income tax, goods and services tax, transfer pricing, stamp duty, property tax and customs. His experience covers providing tax and incentive planning advice on tax-efficient supply chain management, intellectual property management, headquarters and treasury management, and manufacturing activities. Kah Chuan started his career with the Inland Revenue Authority of Singapore, specialising in taxpayer audit and corporate tax compliance. He was seconded to the Singapore Ministry of Finance to work on corporate and international tax reforms, and also worked in the Singapore Economic Development Board dealing with incentive and tax policy formulation matters.

### Chester Wee – Partner, International Tax Services, Ernst & Young Solutions LLP

Chester has 20 years of experience in advising on cross-border tax issues, managing tax controversy as well as handling tax compliance and reporting. His experiences cover a wide spectrum of industries including Consumer Products & Retail, Real Estate, Hospitality & Construction and Oil & Gas (including shipping). Over the years, he has been assisting businesses in reviewing holding structures and operating models, managing tax residence issues, identifying and managing withholding tax issues and permanent establishment risks, and advising on IP strategies and migration, and tax efficient repatriation of profits and cross-border financing. Chester has also advised US, European and Asian multinational companies regarding the establishment of regional as well as global supply chain management structures in Singapore. Chester regularly participates in EY's Global Think Tanks. He speaks regularly at conferences and seminars, both in Singapore and overseas. Chester is a facilitator for the Advanced Tax Programme (International Tax Module) conducted by the Tax Academy of Singapore.

### Stephen Lam – Partner, Transfer Pricing, Ernst & Young Solutions LLP

Stephen has worked in Asia since 2010, with over 17 years of advisory experience in transfer pricing. His experience includes designing, recommending and supporting tax and transfer pricing models in a variety of industries including apparel, e-commerce, fast-moving consumer goods, commodities, hi-tech, logistics, pharmaceutical and shipping. Prior to his time in Asia, Stephen spent over nine years in London advising European multinational corporations based in Belgium, France, Germany, the Netherlands, Republic of Ireland, Sweden and the UK. In addition, he spent three years in Taiwan, where he co-managed the transfer pricing team. Stephen has advised on projects including the restructuring of global supply chains for multinational corporations, global "master file" documentation projects and transfer pricing planning, financial service transactions such as cash pooling structures, valuation of a loan guarantee and intra-group lending as well as Bilateral Advance Pricing Agreement negotiations. Stephen is a frequent speaker at seminars and events on transfer pricing and operating model effectiveness. He has written numerous articles on these topics too. Stephen has a Bachelor degree in Finance as well as in Accountancy from the University of Adelaide (Australia).