

# CROSS BORDER TAX STRATEGIES

04 OCT 2024 (FRI) • 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
- Base Erosion and Profit Sharing 2.0 (BEPS 2.0)
  - Focus on allocation of profits and nexus
  - Pillar One's allocation of profits and nexus
  - Pillar Two's - Global Minimum Tax Rate (MTR) 15%
  - Singapore's response to BEPS 2.0
- Interpretation & Application of Double Taxation Agreements
  - Principles of double taxation and tax treaties
  - Types of tax treaties
  - Framework of tax treaties
  - Anti-avoidance provisions in tax treaties
  - Key features of Singapore's DTAs
- Managing Transfer Pricing in Asia
  - APAC regional update of transfer pricing practices and recent audit trends
  - Issues and challenges of controversy in APAC including Advance Pricing Agreements (APA) in Asia
  - Structuring an appropriate transfer pricing policy in Asia and the increase important of operational transfer pricing

## TRAINERS' PROFILE

### **Ho Kah Chuan – Executive Director, Go Global Gem Pte. Ltd.**

Kah Chuan is an Accredited Tax Advisor of Singapore Chartered Tax Professionals and has amassed more than 18 years of tax services practice. He was a Tax Director in a Big 4 Accounting Firm, prior to that he worked at Singapore Economic Development Board (EDB), Ministry of Finance, and the Inland Revenue Authority of Singapore (IRAS), whereby he established a strong network with the government bodies in Singapore. He specialises in tax advisory, policy formulation, international treaty negotiation, and tax audit. His experience covers advisory on tax-efficient supply chain management, R&D and IP management, headquarters and treasury management, manufacturing, IPO and M&A deals. Often valued for his close connection with Singapore government agencies, he is able to provide valuable insights on how best to obtain government support and has successfully assisted more than 300 incentive advisory cases, including more than 60 family office cases. Some of the key incentives which he is often being engaged to assist on are Headquarters Programme, Global Trader Programme, Finance & Treasury Centre Incentive, investment allowances and fund tax exemption schemes. Kah Chuan is often invited as lecturer for EMBA and Masters programmes and trainer or speaker for tax and incentive related topics.

### **Teo Ying Quan – Partner, International Tax and Transaction Services, Ernst & Young Solutions LLP**

Ying Quan has over 14 years of corporate and international tax experience providing corporate tax advisory and compliance services to local and multinational clients. He has extensive hands-on experience working on tax incentives and grants applications with the Singapore statutory boards, dealing with tax dispute resolution with the IRAS, and has worked on a client's account which is under the sole pre-pilot case for the IRAS' Tax Governance Framework and Tax Risk Management & Control Framework for Corporate Income Tax. Ying Quan is currently on a part-time secondment to Enterprise Singapore in relation to BEPS 2.0 Pillar Two implications to businesses, and Singapore international tax policies and regimes relevant to enterprises seeking global expansion and internationalization. He also served as a faculty member of the EY BEPS University (Singapore edition), where he instruct courses centered on the rules and practical application surrounding BEPS 2.0 Pillar Two rules. Ying Quan holds a Bachelor of Accountancy (Cum Laude) from the Singapore Management University with a second major in Finance. He is a certified Chartered Accountant of Singapore and an Accredited Tax Advisor (Income Tax) of the Singapore Chartered Tax Professionals Limited.

### **Stephen Lam – Partner, International Tax and Transaction Services - Transfer Pricing, Ernst & Young Solutions LLP**

Stephen has worked in Asia since 2010, with over 20 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 transfer pricing documentation projects, transfer pricing controversy (including APAs), cash pooling structures as well as IP structuring. Stephen is a frequent speaker at seminars and events on transfer pricing and operating model effectiveness and has written numerous articles on these topics as well. Stephen has a Double-Bachelor's degree in Finance and Accountancy from the University of Adelaide (Australia). Stephen is also a member of the Singapore Chartered Professionals. Stephen is a facilitator for the Advanced Tax Programme (International Tax Module) conducted by the Tax Academy of Singapore.

### **Matilda Kee – Director, International Tax and Transaction Services - Transfer Pricing, EY Corporate Advisors Pte. Ltd.**

Matilda is a Director in the Transfer Pricing practice of the EY global member firm in Singapore and has more than 13 years of experience working in the Transfer Pricing and Operating Model Effectiveness (OME) arenas, with a focus in the high-tech, service, apparel and consumer goods industries. Matilda was also previously seconded to the EY Australia (Sydney) Transfer Pricing practice and had 18 months of experience in Australian specific transfer pricing and tax controversy cases, advanced pricing arrangements (APAs), and multinational anti-avoidance law (MAAL) cases.