

Strategizing For Global Presence : An International Tax Perspective

M1: 22 Sept 2008, M2: 23 - 24 Sept 2008, M1 & M2: 22 - 24 Sept 2008 (Singapore)



Globalization of trade and investment flows is having a profound effect on the practices and policies of international taxation and the way corporations do business.

This series of workshops is designed to familiarise participants with the myriad tax considerations that impact on the decision-making process when structuring and conducting cross-border trade and investments. Pitfalls to look out for and advantages to leverage on, current topical issues in international taxation and their effect on businesses – these are some of the topics which will be covered in this series to deliver to participants a deeper appreciation of what international tax planning across geographical borders entails.

The series comprises a number of modules which participants may choose to do singly or in its entirety.

Teaching Methodology

The workshops will be delivered using a multi-tiered approach to enhance learning:

1. Overview of the technical knowledge in the topic area under discussion;
2. Extensive use of case studies and examples to illustrate application of the principles;
3. Discussion of outcomes and issues.

Who Should Attend

This series of courses is intended for Tax Practitioners, Managing Directors, Executive Directors, Finance Directors, General Managers, Accountants, Finance Managers and all others involved in the planning and control functions of a company where problems in taxation will be encountered in the company's overseas investments and cross-border transactions.

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M1: The Impact Of Domestic Tax Systems On International Taxation - Know The Crucial Tax Issues That Determine How Business Is Done In A Global Environment

Questions like “How does an investor begin to structure his investment abroad?” must of necessity lead to the next logical question, “Is there any difference to the investor what type of business structure or model is used when venturing abroad?” Know what it takes to be able to deal with these questions and more.

Learning Outcomes

- Be familiar with significant features of various tax regimes
- Appreciate how features of these tax systems impact on the decision-making process concerning the structure and form of global businesses
- Learn how to apply newfound knowledge
- Be aware of common pitfalls and how to avoid these

Content

- Avoiding tax exposure on foreign trading activities
- Establishing presence in the host country
- Choice of vehicle – making a difference
- Financing the business operations - equity or debt
- Tax efficient methods and techniques of repatriating profits to the home country

M2: International Tax Avoidance Measures

This workshop focuses on the common measures adopted internationally to counter tax avoidance. Participants will learn the ‘what’ and ‘why’ of international tax avoidance measures and then ‘how’ to effect change to manage and minimise the risk of running foul of the anti-avoidance legislation.

Learning Outcomes

- Appreciate how anti-avoidance legislation works
- Refining international tax planning strategies to respond to specific tax avoidance legislation

Content

- What is tax avoidance
- Judicial doctrines
- Controlled foreign corporations
- Treaty shopping – use of conduit companies and the beneficial ownership requirement
- Thin capitalization
- Transfer pricing
- Branch profits tax
- Use of tax havens

About the Course Facilitator –

Moira Khaw LL.M, LL.B (Hons.) (Nat. Univ. of S'pore), Advocate & Solicitor, Supreme Court of Singapore.

Moira Khaw teaches Taxation at the Nanyang Technological University (NTU). She joined NTU in 1999 after spending 12 years in tax practice, which included stints in international accounting firms and a 2-year stint as tax partner in a highly-regarded Singapore law firm. She has extensive experience in Singapore and international taxation and has consulted for both high net worth individuals as well as companies in diverse industries such as finance, property development, international manufacturing and trading, as well as foreign law firms.

At NTU, Moira Khaw's teaching and research interests are in Singapore and international taxation. She designed the Advanced Taxation course, an international tax planning module, which she taught consecutively for 6 years. She has also conducted the taxation course at the MBA level. Her teaching has been consistently rated highly by participants.

Moira Khaw has also served on the Committee of the International Fiscal Association (Singapore Branch) and contributed to Cahiers De Droit Fiscal International as Singapore Reporter.

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Location	Module	# of Days	Date	Time	CPE/CPD Hrs	Fees (Early Bird) **		Fees (Normal)		Early Bird
<input type="checkbox"/> Singapore	Module 1	1 Day	22 Sept '08	9am - 5pm	7 hours	S\$628 (M)	S\$698 (P)	S\$698 (M)	S\$798 (P)	15 Aug 2008
<input type="checkbox"/> Singapore	Module 2	2 Days	23-24 Sept '08	9am - 5pm	14 hours	S\$1198 (M)	S\$1298 (P)	S\$1298 (M)	S\$1398 (P)	15 Aug 2008

* (M) denotes members of ACCA or FPCI only, (P) denotes members of the public

** Payment has to be settled on or before the Early Bird Deadline to enjoy the Early Bird Rate

Company / Personal Details

Name of Attendee	Designation	Contact No	Email Address	Membership Organisation	Membership #	Amount(\$)
1						
2						
3						

Total Amount S\$

Booking Contact

Name: Company: Position:
 Address: Postal Code:
 Tel(O): (H): (HP): (Fax): Email:

Method of Payment

Invoice Required
 Invoice to:
 Send to (address):

Mode of Payment

Cheque: Please cross your cheque and send it to:
 FP Consultants International Pte Ltd
 371 Beach Road, #02-08B Keypoint,
 Singapore 199597

Direct Payment: *(All bank charges, if any, to be borne by customer)*
 Account Name: FP Consultants International Pte Ltd
 Bank Name: UOB Bank, 204 Bedok North Street 1,
 #01-417 to 419, Singapore 460204
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Terms & Conditions

I have read and understood the terms and conditions below:

Name:
 Signature: Date:

1. The organiser reserves the right to cancel or make any adjustments to the event.
2. Enrolment is on a first-come-first-served basis.
3. If you are unable to attend, a replacement is welcome.
4. Strictly no cancellation & refund is allowed after confirmation, however a substitute delegate is welcome at no extra cost.
5. Registration is transferable to another person, in writing, at least five working days prior to the commencement of the program.
6. Enrolment confirmation will be sent via e-mail to each enrollee on receipt of each enrolment.
7. **Payments are required with registration and must be received prior to the event to guarantee your place.**

Walk-in participants will only be admitted on the basis of space availability at the event and with immediate full payment. Please note that handouts may not be available during the seminar for walk-in participants.



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