



**NATIONAL UNIVERSITY OF SINGAPORE**  
**Department of Accounting**



**ACC4611: Advanced Taxation**

**Semester 1, 2016/2017**

**Instructor and Coordinator:**  
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**Consultation Hrs.** By appointment through email

## **Course Objective**

This course will build on foundational tax knowledge acquired in ACC3605 and provide students with a basic grounding and appreciation of contemporary issues encountered by businesses and individuals in both the local and a range of international tax jurisdictions.

## **Key Areas of the Syllabus**

Key topic areas are as follows:

- Recap of key income tax concepts covered in ACC3605
- General tax planning techniques
- Tax-efficient structuring of inbound investments
- Tax-efficient structuring of outbound investments
- Personal tax planning for individuals on inbound or outbound assignments

## **Learning Outcome**

On completion of this module, students should be able to obtain an understanding of the following:

- Basic principles of tax planning for business entities in the local context (i.e., inbound planning scenarios).
- Basic principles of tax planning for business entities in the international context (i.e., outbound planning scenarios).
- Basic principles for tax planning for an individual earning employment income (i.e., Local (or Inbound) and International (or Outbound) context).

## **Motivation**

This course will provide students an opportunity a chance to apply foundational knowledge acquired in ACC3605 in more varied and practical real life scenarios e.g., simulating client-advisor scenarios for inbound and outbound investments in both the local and international tax context. Contemporary issues such as BEPs (Base Erosion and Profit Shifting) will be discussed in the course to help provide a current perspective on the latest tax trends in the international tax arena.

## Mode of Teaching

Students are expected to come to class well prepared and be ready to participate in class discussions as required. All additional reading materials, tutorial questions and reading materials and assignments are downloadable from the course website. Lectures may not relate directly to your readings and assignments.

Classes commence from Week 1 (week beginning 8 August 2016, i.e., 1<sup>st</sup> lesson on Thursday 11 August 2016) from 8am to 11am at BIZ1 - Seminar Room 03-05.

## Pre-requisite

BSP1004 Legal Environment of Business  
ACC1002 Financial Accounting  
ACC3605 Taxation

## Reference Texts

Textbook:

- CCH Singapore Tax Workbook 2016/17, 19<sup>th</sup> Edition

Reference guides:

- Taxation in Singapore: 2015/2016 Edition, Simon Poh, McGraw-Hill Singapore.
- CCH Singapore Master Tax Guide Handbook 2016/17, 35<sup>th</sup> Edition.
- Essential Guide to Income Tax in Singapore (2014), Lim Cher Hui, CCH Singapore

## Other References

Selected e-Tax Guides issued by the Inland Revenue Authority of Singapore (IRAS). These can be found at <http://www.iras.gov.sg/>.

Keep abreast of changes to policy and regulation in Singapore, past Singapore Budgets and news about the latest Singapore Budget via the Ministry of Finance website i.e., <http://www.mof.gov.sg/>

## Tax Statutes

Income Tax Act, Cap 134

Goods and Services Tax Act, Cap 117A

Both statutes are available for on-line viewing at the Attorney-General Chambers' "Singapore Statutes Online" website: <http://statutes.agc.gov.sg>

## Assessment

This is a 100% CA course. The weight distributions for the different components are as follows:

<b>Group Assessment (40%)</b>	
Tutorials and case studies	20%
Group Project	20%
<b>Individual Assessment (60%)</b>	
Class Participation	20%
Final Test	40%
<ul style="list-style-type: none"><li>• Duration: 2 hours,</li><li>• <u>Closed Book</u> format, <u>with restricted materials</u> i.e., where only <b>ONE</b> double-sided <b>A-4</b> sized sheet of paper (written or typed) is permitted.</li></ul>	
<b>Total</b>	<b>100%</b>

### Class Participation

Students are strongly encouraged to actively participate in class discussions. Students will be graded on an **individual** basis according to their contributions to the class discussions. In this respect, students should come well prepared for every session in this course.

### Tutorials and Case Studies

Groups will be assigned to prepare written answers and make class presentations for each of the 8 tutorials in this course. There would be approximately 4 students (maximum) in each group.

### Group Project

More details will be released. Assigned groups will also be expected to prepare a written report and make class presentations. The groups for the project will be the same as those for the tutorials.

### Final Test

Date: **Thursday, 10 November 2016** (To be discussed in class).

The Final test will be 2- hour test, close book test which permits authorized materials.

It will be held during class hours.

Students are to **make sure** that they are available to sit for this class quiz.

## Other points to note

- **Attendance:** Since this is a 100% CA course consisting of a 15% Class Participation component for Individual Assessment, students must not miss more than 2 classes (not including absence due to medical (accompanied by medical certificates) or compassionate reasons). Violators will be heavily penalized or may even fail the entire module.
- **CA Attendance:** Students who miss any CA component will receive **zero marks** for that particular component. Absentees can submit their reason for absence from class due to medical reason by submission of medical certificate or in the case of compassionate reasons by way of written explanation.
- Students are encouraged to always feedback to the instructor comments and suggestions that may help the class to learn better.
- Students are to check the IVLE weekly for announcements.
- Please use NUS e-mail for e-mail communications.

## DETAILED SYLLABUS (TENTATIVE)

### 1. Local Tax Planning for Business Entities

- Recap of key income tax concepts covered in ACC3605
- Overview and introduction to basic tax planning and application of common tax planning techniques
- Selected tax incentives in the Income Tax Act and the Economic Expansion Incentives Act (EEIA).  
For example:
  - Headquarters tax incentives
  - Development and Expansion (DEI)
  - Global Trader Programme (GTP)
  - Pioneer Companies/Pioneer Service
  - Investment Allowances
- Tax issues in corporate mergers and acquisitions
- Overview of transfer pricing
- Tax avoidance and tax evasion

### 2. International Tax Planning for Inbound and Outbound Investments

- Objectives of international tax planning and common tax planning techniques
- Discussion of tax issues to consider in inbound and outbound investments
  - Choice of investment vehicle
  - Designing a tax efficient holding structure
  - Planning financing structures
  - Profit repatriation
  - Common pitfalls to avoid
  - Taxation of foreign sourced income in Singapore (revision)
- Role of tax treaties in international tax planning
- OECD Model Tax Convention and contemporary issues e.g., BEPS (Base Erosion and Profit Shifting)

### 3. Individual Tax Planning

- Recap of key individual income tax concepts covered in ACC3605
- Discussion of the following:
  - Structuring employment packages
  - Area representative status
  - Not ordinarily resident (NOR) scheme
  - Tax on tax calculations
  - Tax equalization vs. tax protection