

Cross Border Tax Strategies

February 17th - 18th, 2009

Novotel Clarke Quay, Singapore

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PROGRAM OVERVIEW

In order to successfully compete in the global market, multinationals use control and evaluation systems for monitoring the performance of their divisions. A multinational corporation also deals with the complexities of tax regulations, import-export restrictions, controls on the transfer of funds, and various other restrictions. The challenge for multinationals is to design a transfer pricing strategy which appropriately rewards the management of the company and its interests.

Transfer pricing is no longer just important to tax administrators but to all players in an organization. Globalization is one reason for this interest, the rise of the multinational corporation is another. More than 60% of world trade takes place within multinational enterprises, therefore the importance of transfer pricing becomes clear. More than ever, today's business climate has amplified the importance of reliable tax understanding and initiatives that can be used by multinationals to maximise their profits by tax avoidance and by obtaining tax rebates. Because of the current economic climate, multinationals may find ways to minimize taxes to maximize their profit margin. Many may not know the pitfalls that come with not following the rules and the legal ramifications.

This conference will address the importance of understanding cross-border financing, how you can use transfer pricing as an effective method for tax planning, update you on the recent changes in tax law as well as preparing you for the challenges that lie ahead in your region. Our panel of experts will impart their invaluable knowledge and experience to help you achieve the best for your organization.

KEY BENEFITS OF ATTENDING

- Understand how taxation works of cross border financing and investments
- Formulate an effective tax-planning regime to create savings
- Equip yourself with the knowledge to handle dispute resolutions and audits
- Be updated on key tax laws and key issues in cross border transactions
- Structure and incorporate Advance Pricing Agreements to strengthen transfer pricing strategies
- Learn about recent developments in the APAC region and its impact on your business

SPEAKERS INCLUDE

- Dr. Sanjeev Gemawat
Vice President
Legal & Secretarial
DLF Hotel Holdings Limited, India
- Dr Ng Boon Beng
Finance Director
Oracle Corporation, Malaysia
- Ann-Maree Wolff
Manager, Tax Advisory, Asia Pacific
Rio Tinto Tax, Australia
- Guinness Chan
Director, International Taxes (Asia)
Applied Materials, China

WHO SHOULD ATTEND

- Credit Controllers & Chief Credit Officers
- Vice-Presidents & Directors of Corporate Tax, International Tax, Tax Planning, Taxation, Finance, Accounting
- Chief Financial Officers
- In House Counsel
- Corporate Tax Counsel
- Lawyers
- Heads of Debt Collection
- Recovery Consultants
- Accounts Receivable Staff
- CFOs and Financial Controllers
- Billing Services Managers
- Accountants
- Transfer Pricing Analysts

Supporting Organisations:



AGENDA

Day 1 - 17th February 2009

- 08.30 **Registration**
- 09.00 **Chairperson's Opening Remarks**
- 09.15 **International Tax Planning in Today's Globalized Economies**
- Understanding International tax policies
 - Where are the tax havens for today's businesses?
 - Overview of taxation risks and benefits in Asia
 - Current trends in international tax planning
 - How international taxation affect your corporate expansion, acquisition, expatriate relocation, turnkeys contracts, and formulation of intra group transfer pricing policies
- 10.00 **Coffee Break**
- 10.30 **Cross-Border Transactions – Key Tax Laws and Considerations**
- Permanent establishments - be on the look out!
 - Withholding tax – types of income
 - Reliefs provided by Avoidance of Double Taxation Agreements
 - Transfer pricing – Relevant tax considerations
 - Current issues, cases and practical examples
- 11.15 **Best Practices for Assessing Current Trends and Issues in Tax Laws**
- Identifying important tax resources
 - Developing key questions, and executing due diligence and research
 - Implementing proper legal skills
 - Understanding local and international laws
 - Analyzing bankruptcy situations
 - Evaluating tax crimes
- 12.00 **Lunch**
- 13.30 **Transfer Pricing in Cross Border Transactions – Singapore and the Region**
- Status of transfer pricing regulation in Singapore
 - Comparison study between Singapore transfer pricing policy and its regional counterparts
 - Practical transfer pricing issues faced in Singapore and the region
 - The need for clear transfer pricing guidelines
 - The process for cross border tax planning
 - Recognising the value of intellectual property in the business
 - Reviewing existing business models
 - Assessing transfer pricing methods for some common transactions to the sales of goods and services
 - Adapting to a changing e-environment
 - Dealing with financial transactions
 - Ensuring documents are in order
- 14.15 **Transfer Pricing as a Tax Planning Tool**
- Cross-border transfer pricing policies in an MNC
 - Recent changes in tax rules and enforcements - how to leverage on recent tax developments
 - Reviewing the OECD and Arm's Length Standard and its effect on regional transfer pricing practices
 - Understanding Arms' Length standard to avoid international double taxation
 - Company takeovers – how do you merge their transfer pricing practices?
 - Customs' views on transfer pricing – customs and their interplay with tax practices
- 15.00 **Transfer Pricing in Singapore - Understanding Documentation And Advance Pricing Agreements (APA)**
- What is APA?
 - APA advantages and drawbacks
 - APA processes and applications
 - APA and how it has developed in the region
 - Planning and negotiation of a successful APA
 - Supplementary Administrative Guidance on APAs
- 15.45 **Coffee Break**
- 16.15 **Transfer Pricing in Singapore - Understanding Documentation And Mutually Agreed Procedures (MAP)s**
- What is MAP?
 - MAP advantages and drawbacks
 - MAP processes and applications
 - Practical aspects of MAP and its pitfalls
- 17.00 **Chairperson's Closing Remark and End of Conference**

AGENDA

Day 2 - 18th February 2008

- 08.30 **Registration**
- 09.00 **Chairperson's Opening Remarks**
- 09.15 **Tax Structuring for MNC's – Managing Cross-Border Operations and Key Domestic Consequences**
- The role of the tax department in a MNC's strategy and tax efficiency optimization
 - Funding – capital contributions, loans and equity
 - Functions – holding company, IP exploitation, group treasury
 - Withholding taxes – dividends, interest, royalties
 - New vs. old domestic tax structures
 - Tax consolidation, transfer pricing and abuse of law
- 10.00 **Coffee Break**
- 10.30 **Audits, Litigation and Criminal Tax Defense – Current Enforcement Concerns and Common Issues**
- Examining the need for clarity of transfer pricing practices and documentation
 - Assessing tax audits in your organization
 - Effectively handling dispute resolution - audit preparation and defense strategies
 - Identifying the range of tax issues, including sensitive audits, tax compliance and reporting, compromising tax debts, defending reporting positions, resolving employment tax issues, obtaining contested tax refunds, etc.
 - Tax collection processes and dealing with tax issues that arise in business settings and in tax fraud investigations
 - Potential obstacles, issues and pitfalls – when are you at risk?
- 11.15 **Dispute Resolution – Pros and Cons of Alternate Means of Resolving Transfer Pricing Issues**
- Competent authority, APA'S, Fast Track Appeals Settlement
 - Arbitration conventions
 - Tax Litigation
 - The role of economic analysis in transfer pricing dispute resolution
- 12.00 **Lunch**
- 13.30 **Intangible Property – Current Transfer Pricing Trends**
- Recent developments relating to identifying and valuing intangibles
 - Key planning considerations
 - The disintegrating line between services and intangibles
 - Legal consequences surrounding intangibles
 - The role of economic analysis in valuing and structuring intangibles
 - Practical approaches to transferring intangibles and tax optimization opportunities
- 14.15 **International Professional Ethics in Cross Border Investments and Tax Planning**
- Identifying issues regarding Cross Border Conflicts of Interest
 - Multiple party representations
 - Privilege and confidentiality
 - International fiduciaries
- 15.00 **Tax Implications in Cross Border M&A – Minimising Tax Liabilities**
- Identifying key tax issues in Cross Border M&A's
 - Key considerations in structuring and negotiating successful cross border M&A deals for optimal tax considerations and minimal tax risks
 - Understanding tax consequences for transfer of assets, services, ownership
 - Performing due diligence reviews to uncover tax liabilities and exposure in potential mergers, acquisitions and other transactions
- 15.45 **Coffee Break**
- 16.15 **Reviewing Tax Considerations When Drafting International Agreements**
- Assessing tax risks involved in negotiating cross border agreements
 - Evaluating tax issues
 - Corporate tax issues
 - Withholding taxes
 - Taxes in sale
 - Developing tax efficient and effective structures for cross border deals
 - Analyzing tax implications
 - Interaction of tax regimes in different jurisdiction
 - Minimizing tax liabilities
 - Observing tax treaties
 - Handling multi-jurisdiction taxation
- 17.00 **Chairperson's Closing Remark and End of Conference**

Registration Form

YES, I would like to register:

Cross Border Tax Strategies

17th & 18th February, 2009, Novotel Clarke Quay, Singapore

Standard Price SGD 1,450 + 7% GST / Person (Including participation fee, course materials, lunch & refreshments)

Early Bird Discount SGD 1,250 + 7% GST / Person (Registration before 17th January, 2009)

Supporting Organization / Partner: (exclusive discount applicable)

I am a member / subscriber of _____ association / media partner; Membership number: _____

Closing date of registration: 10th February, 2009

Please fill in the registration form and fax to +65 6349 0132 to book your place.

Person 1

Family Name	Given Name		
Job Title		Profession	
Firm/Company			
Firm/Co. Address			
Email		Mobile/Pager	
Tel (Office)	Fax	Signature	

Person 2

Family Name	Given Name		
Job Title		Profession	
Firm/Company			
Firm/Co. Address			
Email		Mobile/Pager	
Tel (Office)	Fax	Signature	

Terms & Conditions:

1. Registrations are confirmed when we send a written Confirmation via email or fax. If you have not received a Booking Confirmation prior to the commencement of the course, it is the delegate's responsibility to contact LexisNexis to confirm their place.
2. An official invoice will be sent to you 7 working days after your registration is received. Payment must be received, in full within 7 days of receiving the invoice.
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9. No refunds will be given.
10. No shows will also be charged in full.
11. The conditions are subject to change without prior notice.

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