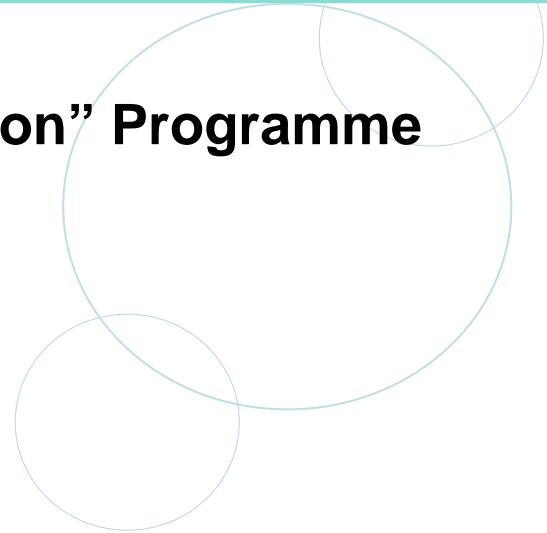


New Transfer Pricing “Consultation” Programme

A Joint Seminar By
Tax Practice Group
&
Transfer Pricing Associates



The Seminar

Date: 19 September 2008, Friday
 Time: 8.30 am – 12.50 pm (Tea break will be served at 10.30 am)
 Venue: 4 Battery Road #17-01 Bank Of China Building (Rajah & Tann LLP Auditorium)
 Speakers: Mr Stephen Phua, Mr Yeoh Lian Chuan, Ms Christina Ng, Ms Stacy Choong, Mr Douglas Fone, Ms Tan Hui Ching and Mr Michael Velten
 Fee: No Charge

The Programme

8:30 a.m.	Registration	
9:00 a.m.	Welcome And Survey Of Recent Global And Local Developments In Transfer Pricing	Associate Professor Stephen Phua, Rajah & Tann LLP
9:20 a.m.	A Practical Guide And Case Study on: <ul style="list-style-type: none"> Resolving Transfer Pricing Controversies Handling Audits And Queries “Best Practices” In TP Documentation 	Mr Douglas Fone, Transfer Pricing Associates Panelists : <ul style="list-style-type: none"> Ms Christina Ng, Rajah & Tann LLP Ms Stacy Choong, Rajah & Tann LLP
10.30 a.m.	Tea Break	
10:50 a.m.	Business Restructuring And Transfer Pricing	Mr Douglas Fone, Transfer Pricing Associates
11.20 a.m.	<ul style="list-style-type: none"> The OECD’s Work On Attribution Of Profits To Permanent Establishments TP Implications Of Recent Changes To The 2008 Version Of The OECD Model Tax Convention 	Mr Yeoh Lian Chuan, Rajah & Tann LLP
11.50 p.m.	A Panel Discussion on: A Personal View Of Transfer Pricing In The Financial Services Sector In Asia	Leader: Mr Michael Velten (Guest Presenter) Panelists : <ul style="list-style-type: none"> Ms Tan Hui Ching, Transfer Pricing Associates Mr Yeoh Lian Chuan, Rajah & Tann LLP
12.20 p.m.	Q&A Session	
12.50 p.m.	The End	



Stephen Phua, a Consultant with the Tax Practice Group at Rajah & Tann LLP, is an Associate Professor with the Faculty of Law in NUS where he taught tax law for over 18 years and served as a Sub Dean and Director for the Centre for Commercial Law Studies. He was a tax consultant at law firms, universities and government departments.

Stephen served as a member on the Singapore Income Tax Board of Review and the Tax Advisory Group of the Ministry of Finance. He also held visiting/teaching positions in foreign universities including Harvard University, New York University and the University of British Columbia. He remains a member of the GST Board of Review and Valuation Review Board. He is a member of the Steering Group of the INTR, Centre for Tax Policy and Administration, OECD. Besides numerous conference papers and articles in refereed journals, Stephen's publications include being Editor of two books: 'Recent Developments in Financial Regulation and Capital Markets' (2003, LexisNexis Butterworths) and 'Excise Taxation in Asia' (2007, NUS).

Yeoh Lian Chuan was called to the Singapore Bar in 1994. He focuses primarily on tax structuring and planning advice, and has particular expertise in the areas of corporate transactions and financial services. From 1998 to 2001, Lian Chuan was a Deputy Director in the Financial Centre Development Department of the Monetary Authority of Singapore and Head of the Tax Unit. Lian Chuan has also worked extensively on a number of areas of financial sector policy including liberalisation, private banking and wealth management, employee savings and the trust industry.

Lian Chuan also advises a variety of clients on financial services regulatory matters. Lian Chuan is recommended by *Who's Who Legal - Singapore 2008* for Corporate Tax, described as being 'as knowledgeable as you can get when it comes to Singapore taxation', *The Practical Law Company's Which Lawyer? Yearbook (2008)* and *Best Lawyers 2008*. Lian Chuan is a member of the International Tax Planning Association, the International Fiscal Association (IFA), the Society of Trust and Estate Practitioners ('STEP') and the Singapore Trustees Association.

Christina Ng has more than 18 years of legal practice experience. She specializes in energy and infrastructure, and has been extensively involved with investments and mergers and acquisitions in the region. To each of her transactions, she brings her knowledge and experience in taxation which is particularly useful to clients in structuring cross-border transactions. Christina also regularly advises clients on a diverse range of tax planning and structuring matters. Christina is a member of the International Tax Planning Association, the International Fiscal Association, and the Society of Trust and Estate Practitioners ('STEP').

Christina has been recommended by various independent legal journals in *The Practical Law Company's Which Lawyer? Yearbook (2008)* as a highly recommended tax practitioner; *Who's Who Legal - Singapore 2007* for M&A, *AP Legal 500 2003/2004 Edition* for M&A with a technology specialization; *AP Legal 500 2004/2005 Edition* for advising the Bharti Changi Consortium on the modernization and restructuring of the Mumbai and Delhi airport; *AP Legal 500 2006/2007 Edition* as a leading individual; and *International Tax Review 2004*.

Stacy Choong commenced her tax and trust practice upon graduation from the National University of Singapore in 1994. She is admitted to the Singapore Bar (1995) and the New York Bar (2001) and has practiced in the United States. Stacy advises on all aspects of tax laws and has substantial experience in providing tax planning and structuring advice in connection with a wide range of corporate transactions. She has also built an extensive tax dispute resolution practice including the obtaining of tax rulings, liaison and negotiations with tax authorities and the handling of tax litigation.

Stacy is also recognized for her private wealth and trust practice. She advises on trusts for both commercial and family / private purposes and also advises charities, non-profit organizations and foundations. Stacy is listed in *Best Lawyers 2008* in the specialties of Tax & Trust and Estates; *Who's Who Legal - Singapore 2008* for Corporate Tax; and *The Practical Law Company's Which Lawyer? Yearbook (2006, 2007 and 2008)* in the area of Tax Practice.

Douglas Fone has a background in Big 4 firms, providing international tax and transfer pricing services since 1987 in London, Hong Kong, Singapore and Sydney. He has been devoted exclusively to Asia Pacific international tax and transfer pricing consultancy since 1991. Doug joined the global independent specialist firm Transfer Pricing Associates (TPA) in 2005 to lead the development of the business in the Asia Pacific region, and is now a partner of the global firm. TPA has grown to become one of the leading transfer pricing firms in Asia, according to the *International Tax Review 2007 Asia Tax Awards*.

Douglas's has advised many leading multinational enterprises on international tax and transfer pricing issues, notably Korean, Japanese, European and Australian multinationals with significant operations in the region, across a wide variety of industries. He is a regular presenter at transfer pricing seminars and conferences around the region, has written a number of articles for publications such as *CCH's China Tax Intelligence* and *Euromoney's International Tax Review*, and is co-author of the book *Transfer Pricing - A Practical Guide* published by CCH China.

Douglas's particular area of specialization is advising multinationals in the Asia Pacific region on the design of efficient transfer pricing systems, preparation of 'MasterFile' transfer pricing documentation and devising/implementing transfer pricing planning strategies to mitigate their risk and overall effective tax rate. He also advises multinational investors on transfer pricing dispute resolution strategies, including the negotiation of unilateral and bilateral Advance Pricing Arrangements in a variety of industries and the effective resolution of complex transfer pricing audits.

Tan Hui Ching joined the Transfer Pricing Associates group from one of the Big 4 Firms in 2007. Ching is a Partner, based in our Sydney office. Ching has over 11 years of international tax and transfer pricing experience in a variety of locations in Asia and Europe - Sydney, Singapore, Frankfurt and Amsterdam. In addition, Ching holds a degree in Bachelor of Commerce and is a member of the Institute of Chartered Accountants in Australia.

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Please fax or email the attached Reply Form confirming your attendance by **10 September 2008**.
Please do not hesitate to contact the Knowledge & Risk Management Group if we can be of any assistance.

Our contact details:

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Fax: 6438 9622

Email: rtseminars@rajahtann.com

Name (1): _____

Designation: _____

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Email: _____

Name (2): _____

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Name (3): _____

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Name (4): _____

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Tel: _____ Fax: _____

Email: _____

Company: _____

Address: _____
