

**2022**  
**Graduate Programmes**  
**SCHOOL OF**  
**LAW**

# **MASTER OF TAXATION**

## **GRADUATE DIPLOMA IN TAXATION**



## Programme Overview

Advanced tax training has been a part of the Singapore University of Social Sciences (SUSS) ever since we were approached by the Tax Academy in 2007 to launch a Master of Taxation (MTAX) programme here in Singapore.

Since the first intake in 2009, the training courses have been continuously revised and replaced to ensure that our graduates are provided with a comprehensive programme of study in Singapore and international taxation. International Taxation has grown in importance in recent years, and the tax courses offered here give students a thorough grounding in both substantive tax rules and tax policy and to equip them for future practice, whether they intend to enter or return to private practice, in-house employment or government service. The courses aim to equip students with a framework of approach to enable them to deal with issues and challenges of the real world of taxation.

The programme also provides useful Continuing Professional Education (CPE) courses that cover current developments and changes in taxation law.

The courses can be taken on their own and subject to meeting the necessary requirements, can also be accumulated or "stacked" to build up a Graduate Certificate in Taxation, a Graduate Diploma in Taxation or a Master of Taxation.

Students who have already completed the Executive Tax Programme Level III (Advanced Tax Programme) will receive credit recognition for 4 subjects.

## Our Aims

- To provide training in Tax Policy, Legal Framework, Singapore Individual and Corporate Income Tax, Tax Treaties, Transfer Pricing, International Tax Planning and Goods and Services Tax.
- To equip practitioners with a deeper and broader knowledge of the fundamentals of international taxation, capabilities very important to a tax practitioner in an open economy such as Singapore.
- To provide practitioners a wider frame of reference when looking at taxation. Taxation does not exist in a vacuum, and the practice of taxation directly or indirectly involves wider considerations such as corporate governance, corporate reporting and the general economy.



## Programme Structure

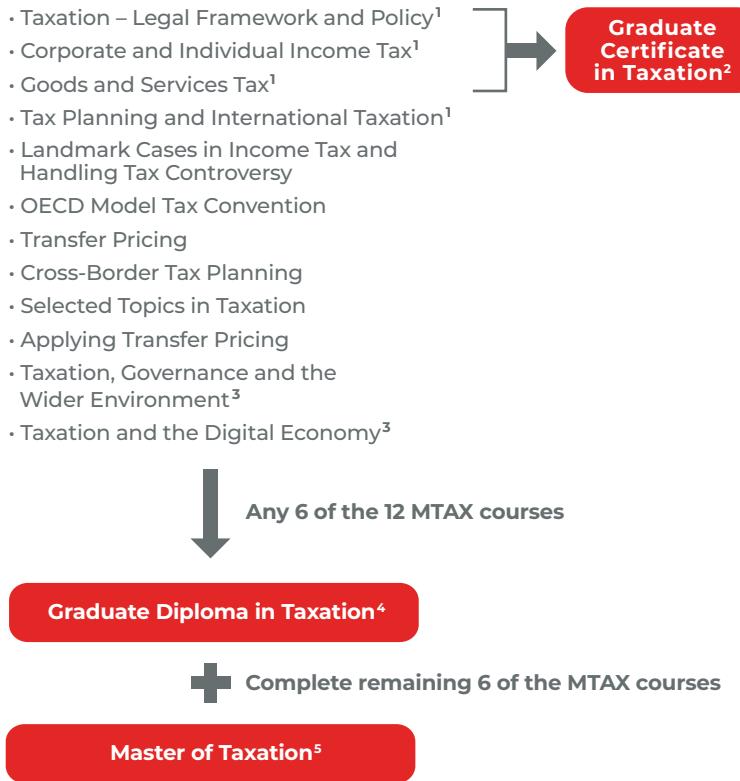
The programme is built around three areas:

- Tax and its environment – where tax and its relationship with the wider world is explored, e.g., the law, corporate governance, corporate accounting, the digital economy
- Domestic taxation – taxation within Singapore
- International taxation – the international principles that deal with taxation across domestic borders

Students are required to complete a total of 60 credit units (cu), comprising 12 courses, with a minimum cumulative grade point average (CGPA) of 3.0 to graduate with a master's degree. All courses are 5 cu unless stated otherwise. Each course lasts 4 Saturdays, and provides 30 hours of course instruction in addition to the self-study that is required to fully explore the topics within the course.

Each course can be taken individually for Continuing Professional Education purposes. If the student does not take any assessment, the student will be given a Certificate of Attendance. If, however, the student actually takes assessments, then the student will be given a Certificate of Achievement.

For those who wish to take the courses in a more structured manner, a suggested flow would be as follows:



### Explanatory Notes:

- <sup>1</sup> Students who have already completed the Executive Tax Programme Level III (Advanced Tax Programme) offered by the Tax Academy of Singapore will receive credit recognition for these 4 courses (20 cu), and therefore will only have to complete 8 courses (40 cu) for the master's degree. Students under the Graduate Diploma programme will receive 15 cu of credit recognition and will only have to complete 3 courses (15 cu).
- <sup>2</sup> Courses within the GCTAX programme are offered in the July semester via Centre for Continuing and Professional Education (CCPE). Upon successful completion of these courses and attaining the min. CCPA of 2.5, eligible students may apply for the Graduate Certificate in Taxation.
- <sup>3</sup> Students proceeding to the Master of Taxation can substitute one or both of the courses with any Graduate Unrestricted Electives.
- <sup>4</sup> Students need to complete a total of 30 cu with a min. CCPA of 2.5 to be awarded Graduate Diploma in Taxation; and a min. CGPA of 3.0 to proceed to Master of Taxation.
- <sup>5</sup> Students need to complete a total of 60 cu with a min. CGPA of 3.0 to be awarded Master of Taxation.

## **TAX501 Taxation – Legal Framework and Policy**

TAX501 Taxation – Legal Framework and Policy equips the student with the knowledge of the legal framework of taxation, and the basics of the policy behind taxation. It also equips the student with skills to answer questions that are new or novel. The tax advisor is sometimes faced with this very challenge, which could come from clients or colleagues from outside Singapore trying to explore how the Singapore authorities would view a particular transaction or structure. It could, however, just as easily come up when clients ask about a new idea they have just heard of. The course introduces the student to the skills of essay writing, then the sources of tax law in Singapore. Having looked at the sources of law in Singapore, the student will be taught how to weigh up sources and utilise them in preparing research documentation or advice to clients. The course also introduces students to the various tools that can be used in executing such research. Students will require access to a notebook and access to the Internet in order to gain access to Singapore Statutes Online and to LawNet.

## **TAX503 Corporate and Individual Income Tax**

TAX503 Corporate and Individual Income Tax equips the student with the knowledge of the legal basis of taxation, i.e., the Income Tax Act. It also equips the student with skills to answer questions that are new or novel. The student learns that taxation is grounded in the legal provisions of the Income Tax Act, and learns to be familiar with the structure of the Act, and how the Act should be interpreted and applied, as well as how it is applied. The student will be equipped to navigate the Income Tax Act and call upon the relevant case law to help interpret the Act when faced with unfamiliar or novel situations. The course is not a computational course.

## **TAX505 Goods and Services Tax**

TAX505 Goods and Services Tax equips the student with the knowledge of the legal basis of goods and services tax, i.e., the Goods and Services Tax Act. It also equips the student with skills to answer questions that are new or novel. The student learns that taxation is grounded in the legal provisions of the Goods and Services Tax Act, and learns to be familiar with the structure of the Act, and how the Act should be interpreted and applied, as well as how it is applied. The student will be equipped to navigate the Goods and Services Tax Act and call upon the relevant case law to help interpret the Act when faced with unfamiliar or novel situations. The course is not a computational course.

## **TAX507 Tax Planning and International Taxation**

TAX507 Tax Planning and International Taxation equips the student with the knowledge of the bases of international taxation; both the hard-law of tax treaties to the soft-law of general principles that have arisen over time. It introduces the student to various planning principles, ideas and opportunities that exist for the cross-border business. It is primarily a course that introduces students to international taxation matters covered in far greater depth in later MTAX courses. Globalisation means that increasingly more businesses are being conducted across borders. These new business ventures provide opportunities for large and small enterprises to look for new markets. However, venturing to do business across a border could result in unexpected tax bills, and could render what would have been a good venture into an unmitigated disaster.

This course provides the students with an overview of such international tax matters and examines pre-BEPS and post-BEPS ideas. (BEPs refers to the Base Erosion and Profit Shifting project undertaken by the OECD/G20 nations in 2012 to reform the international tax system because of perceived tax planning abuses.)

## **TAX509 Selected Topics in Taxation**

TAX509 Selected Topics in Taxation invites participants to update and expand existing tax knowledge by analysing current tax issues and advanced taxation topics as they arise from common international business transactions. As multinational companies look toward overseas markets, suppliers or manufacturing facilities, international tax issues have multiplied and gained in complexity, and have become more global at a speed that outpaces any other area of tax law. It is important for tax professionals to keep abreast of these changes and to recognise and understand the consequences and ramifications of these on the manner in which multinational companies intend to do business. Current thinking, techniques and practices adopted in dealing with these issues will be explored.

Upon completion of the course, students will be able to identify and anticipate important international tax issues that may arise in a multinational business transaction or a group restructuring exercise.

This course is a “deep dive” into selected topics already covered in TAX521 OECD Model Tax Convention and TAX525 Transfer Pricing, but which are so important they merit more in-depth study.

## **TAX521 OECD Model Tax Convention**

TAX521 OECD Model Tax Convention introduces students to the OECD Model Tax Convention. Tax treaties are negotiated and signed by governments primarily to avoid double taxation, and to prevent fiscal evasion. Tax treaties are not negotiated de novo, but rather countries normally start from Model Treaties that exist around the world. The most important of these models is the OECD Model Tax Convention. Another major model, the UN Model Tax Convention between Developed and Developing Countries, takes the OECD framework and amends it to reflect the differing interests between the developed nations represented by the OECD and the developing world.

Most tax practitioners will come across the treaties in bits and pieces, dipping into various articles as necessary. This course takes the students on a systematic tour of the OECD Model Tax Convention starting from Art 1, providing not only a comprehensive view of the model treaty as a whole, but more importantly, an understanding of how the various articles interact – something a “casual dipper” would probably miss.

## **TAX523 Cross-Border Tax Planning**

TAX523 Cross-Border Tax Planning introduces the student to various planning principles, ideas and opportunities that exist for the cross-border business, drawing upon International Taxation matters covered primarily in TAX509, TAX521 and TAX525. Globalisation means that more and more businesses are being conducted across borders. These new business ventures provide opportunities for large and small enterprises to look for new markets. However, venturing to do business across a border could result in unexpected tax bills, and could render what would have been a good venture into an unmitigated disaster.

### **Differentiation from International Taxation and Tax Planning**

International Taxation and Tax Planning is a module currently replaced by International Tax Planning (ATP108) of the Advanced Tax Programme of the Tax Academy. ATP108 is an introductory programme of 9 hours, introducing students to the framework surrounding the basics of international tax planning. TAX523 is a 32-hour course that will take students beyond the framework, and actually explore and understand the legal bases behind the various principles that govern international tax planning. This will equip students with the knowledge upon which they can provide sound advice in novel situations that might confront them in their working life.

## **TAX525 Transfer Pricing**

TAX525 Transfer Pricing provides the student with the opportunity to explore the challenges of transfer pricing in far greater depth than normally covered in continuing education programmes. In taxation, “transfer pricing” refers to the pricing of contributions such as assets, services or funds made across borders between different parts of one legal entity, or between different entities of a multinational-enterprise. Because this price can be used as a tool to shift profits from one tax jurisdiction to another, tax authorities have developed a complex principle to price such transactions – the “arm’s length principle”. Any price that falls foul of a tax authority’s transfer pricing principles risk being adjusted by that tax authority, and could lead to double taxation of the profits within the same group. Many countries in this region have introduced transfer pricing rules, leading to an increase in transfer pricing scrutiny by tax authorities.

Students will be taken through the acknowledged reference manual for transfer pricing, the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations.

## **TAX529 Taxation, Governance and the Wider Environment**

TAX529 Taxation, Governance and the Wider Environment challenges the student to look at taxation beyond the corporate tax return. In Part I, students examine the interplay between financial reporting and taxation, in particular the tensions arising from the fundamental principles underlying the Financial Reporting Standards, particularly the need to report the current position of the entity, and the need for certainty, as espoused in revenue law. In Part II, students will explore how taxation could affect the minds of the Board of Directors, and the tension between taxation, especially tax planning, and the principles underpinning corporate governance.

## **TAX531 Applying Transfer Pricing**

TAX531 Applying Transfer Pricing builds on TAX525 Transfer Pricing, which provided the student with the opportunity to explore the challenges of the OECD Transfer Pricing Guidelines for Multinational and Tax Administrators. A Transfer Pricing Report is the usually the basis upon which a multinational’s transfer pricing policy is defended, and is also the main document submitted to the tax authority for their scrutiny. The Report is therefore a vital piece of documentation that can either be prepared as a compliance requirement, an aggressive planning tool, or as a defensive document. In any case, understanding of the application of the rules covered in TAX525 is key to this course, as students are taken through the application of the principles through case studies and exercises.

At the end of this course, students will have the skills to prepare a transfer pricing report complying with OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations and will also be able to critique a report, evaluating whether or not a report is acceptable under those guidelines.

## TAX533 Landmark Cases in Income Tax and Handling Tax Controversy

TAX533 Landmark Cases in Income Tax and Handling Tax Controversy builds on the skills that the student acquired in TAX501 Taxation – Legal Framework and Policy. In Part I of TAX533, the students are required to immerse themselves in cases which are more complex and where there are more than one judgement involved. Using skills from the earlier course, students learn how to identify the ratio decidendi in cases where more than one judge provides a judgement. In the process of this, the students also get to explore major cases in Income Tax, and understand why these cases are important to our understanding of Income Tax law of Singapore today. In Part II, the students will explore cases, but in this set of cases, they will be looking more to the deft handling or missteps in the handling of the cases, and learn from the cases how a tax controversy should (or should not) be handled.

## TAX535 Taxation and the Digital Economy

TAX535 Taxation and the Digital Economy equips the student with the knowledge of the digital economy, and how the tax systems around the world, and the various multilateral organisations dealing with taxation are grappling with the complexities of the new economy, using old and new rules and principles. The course covers how the pre-BEPS world looked at the digital economy, and explores the post-BEPS world and how it is designed to tax the digital economy. (BEPs refers to the Base Erosion and Profit Shifting project undertaken by the OECD/G20 nations in 2012 to reform the international tax system because of perceived tax planning abuses.) The course looks at the efforts of various countries, such as the USA, the UK and Australia, to tax the digital economy outside of the multilateral approach of the OECD. Even while countries and multilateral bodies act, the digital economy evolves. The course explores how taxation deals with issues such as the platform or sharing economy, the internet of things, bitcoins, blockchains and artificial intelligence.

## ADMINISTRATIVE DETAILS

### Admission Criteria

Applicants must possess an undergraduate degree or an equivalent qualification from a recognised institution.

For SUSS graduate programmes that are conducted in the English Language, you must meet the English Language Proficiency Requirement (ELPR)\* if your undergraduate degree is not awarded by an English-medium university, or your undergraduate degree is awarded by an English-medium university but the language of instruction was not English.

\* at least an IELTS (Academic) score of 6.5, or a TOEFL score of 580 (paper-based) or 85 (internet-based), or a PTE Academic score of 58, or C1 Advanced score of 180 [score must be obtained within the last 2 years at point of application].

Applicants with an undergraduate degree that was conducted in English but awarded by a non-English medium university must produce an official letter from the university to certify as such in order to seek waiver of the ELPR requirement.

In addition, you will need to meet these minimum requirements:

- Professional qualifications - eg: ACCA, CA (Sing), CPA (Aust) may be accepted in lieu of a degree
- A high level of motivation
- Provide a full CV detailing your work experience

Shortlisted applicants may be required to undergo one or more interviews and/or take such written admission or other evaluation tests as may be prescribed by SUSS from time to time.

All applications are considered individually on merit, and the offer of admission is dependent on the number of places available in individual programmes. Admission is solely at the discretion of SUSS and the decision is final and binding. SUSS reserves the right to refuse admission and is not obliged to offer an explanation for the non-admission of unsuccessful candidates.

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 Singapore University of Social Sciences



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