

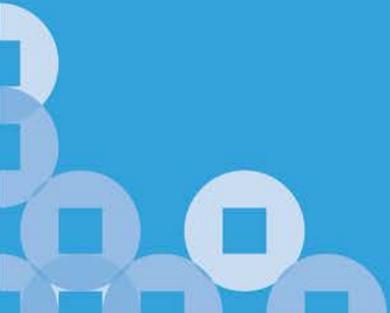
BRITACOM: Expediting Tax Dispute Resolution Singapore 15 October 2021



INLAND REVENUE
AUTHORITY
OF SINGAPORE

Topic 1

How to solve the problem that tax policy enforced by the government may be implemented inconsistently in different regions?



Singapore's context

- In Singapore, the Ministry of Finance is responsible for managing Singapore's fiscal policies, including tax policies.
- The Inland Revenue Authority of Singapore (“IRAS”) is the main tax administrator to the Singapore Government.
 - There is no regional tax office in Singapore.
 - For income tax, IRAS is responsible for end-to-end administration
 - Corporate Income Tax (CIT) and Gaming Taxes – Corporate Tax Division;
 - Individual Income Tax (IIT) - Individual Income Tax Division.

Tax Assessment Process

IRAS adopts a risk-based approach in the review of tax returns.

Companies

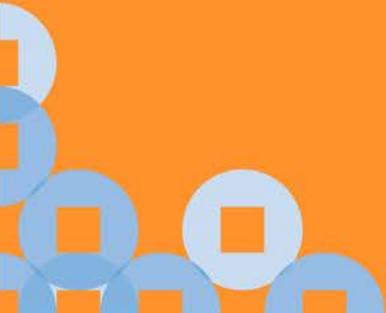
- Companies are profiled based on the complexity of their businesses and tax matters, and risk to revenue.
- Companies are segregated into the following categories
 - Companies with More Complex Tax Affairs (approximately 10%)
 - Companies with Straightforward Tax Affairs (approximately 90%)
- To complement the risk-based approach, IRAS conducts reviews on a small percentage of companies with straightforward tax affairs by reviewing selected returns.

Individuals

- Compliance efforts are focused on the following:
 - Timely filing of income tax returns
 - Under reporting of revenue and wrongful claims of purchases/expenses by cash-based industries
 - Arrangements that constitute Tax Avoidance
 - Reconciliation of income declaration with assets purchased

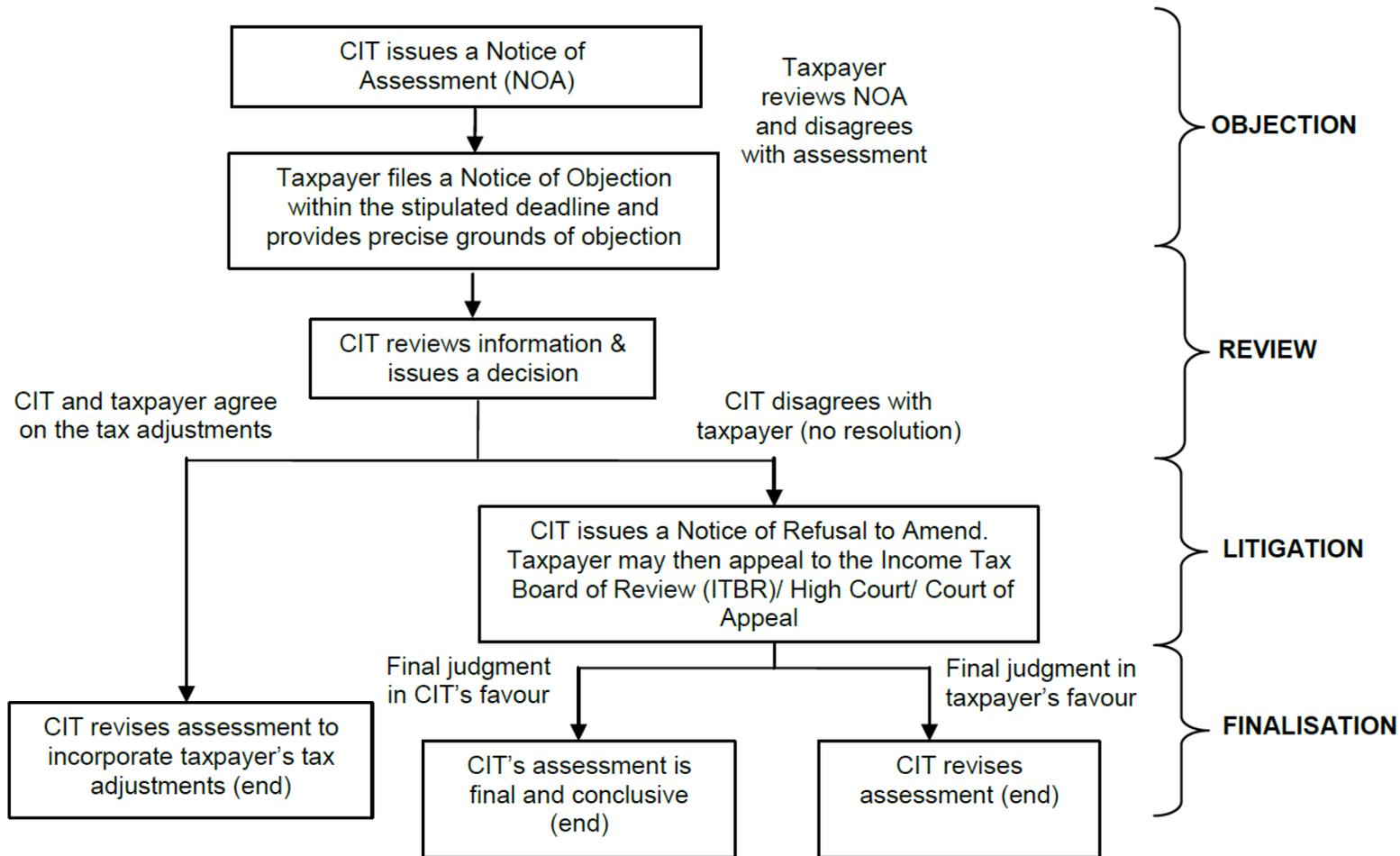
Topic 2

Introduction for the procedures of
domestic tax disputes resolution



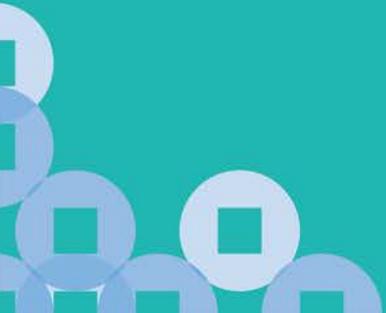
Singapore's Objection and Appeal Process

- The Comptroller of Income Tax (“CIT”) is empowered to raise assessments based on the information furnished by taxpayers or in the absence of information, to the best of his judgment.
- If a taxpayer does not agree with an assessment raised by the CIT, a Notice of Objection must be filed with the CIT.
- The Objection and Appeal Process comprises four stages, namely (1) Objection, (2) Review, (3) Litigation and (4) Finalisation.



Topic 3

Introduction for the mechanism of
cross-border tax disputes resolution



Options Available

	Domestic	International
Prevention of dispute	Unilateral APA/Advance Ruling	Bilateral or Multilateral APA
Resolution of dispute	Appeal and Litigation	MAP Arbitration

Thank You

The information presented in the slides aims to provide a better general understanding of taxpayers' tax obligations and is not intended to comprehensively address all possible tax issues that may arise. This information is correct as at the date of presentation. While every effort has been made to ensure that this information is consistent with existing law and practice, should there be any changes, IRAS reserves the right to vary its position accordingly.