

Overview

By partnering with one of the oldest and largest firms in Singapore, you can trust our broad and highly skilled Tax practice to help you navigate all domestic and international tax issues. We work to understand your background, your business and goals to tailor our tax service to suit your specific commercial needs.

From finance and real estate to technology, manufacturing and shipping, our experienced team regularly provides tax advisory services to a wide range of businesses. We provide legal counsel and consulting services on transactional matters, both inbound and outbound investments, and structuring work. This includes advising on corporate and individual income tax, international tax planning, transfer pricing, goods and services tax (GST) and stamp duties. As part of a global organization with tax practitioners spread over more than 30 cities in the world, we are well-equipped to advise on complex, multi-jurisdictional cross-border issues.

In addition, the Tax team also focuses on private client matters, advising high net-worth individuals and families, business owners, trust companies and private banks in areas such as trusts, estates, wealth planning, family and business succession, and probate. As part of their holistic suite of services, the team also advises on related issues including trustee obligations, money laundering, secrecy, tax transparency, and immigration.

Representative Experience

- **Flipkart Private Limited (“Flipkart”):** Acting as Singapore counsel to Flipkart, advising on the Singapore tax implications in a US\$16 billion acquisition leading to Walmart Inc becoming Flipkart’s largest shareholder.
- **A major Fortune 500 and S&P 500 multinational:** Reviewing and advising on impact of proposed changes on existing tax incentives and assisting clients in their negotiations and discussions with government authorities.
- **Leading multinational semiconductor conglomerate:** Acting as Singapore tax advisors to the clients on their entry into a syndicated finance lease of certain assets.
- **Multinational in the business of manufacturing electronics testing and measurement equipment and software:** Advising on a major restructuring exercise in the context of certain grandfathering rules and changes in tax incentives awarded to the client and reviewing transaction documents to optimise tax implications arising from restructuring steps.
- **Global Energy Group in the Oil & Gas sector:** Acting as Singapore tax advisors to the clients on their acquisition of certain Indian renewable energy projects held through a Singapore holding structure.
- **A leading multinational technology company listed on the HKSE:** Advising a leading multinational technology company listed on the HKSE on and submitting legal arguments regarding transfer pricing adjustments made by IRAS and its interpretation of Section 34D.
- **Fintech companies:** Providing tax structuring advice to FinTech companies, including advising them on the direct and indirect tax issues arising from their token offerings.
- **A clean tech company:** Advising a clean tech company on the setting up of its global headquarters in Singapore and how it can structure its business model in relation to its manufacturing plants in different locations across the world.
- **A major corporation listed on the SGX:** Review and advising on the tax classification of certain real estate properties held by the client and impact of an accounting re-classification of the properties for tax purposes, and providing recommendations to the client.

- **Major Asian conglomerate and property developer:** Advising on the restructuring options for the group, having regard to the recent introduction of economic substance legislation in several offshore jurisdictions.
- **Major local real estate developer:** Advising on the GST risks and implications of the purchase of a mixed-use commercial/residential property from a non-GST-registered vendor, and negotiation on relevant potential GST liability.
- **Tax Avoidance Cases:** Representing a group of doctors in their tax appeal cases in Singapore in relation to tax avoidance alleged by IRAS in the use of corporate structures to conduct their businesses.
- **Various high and ultra-high net worth fund clients:** Providing international corporate and HNWI clients with tax advice on Singapore's fund tax incentives, as well as structuring advice to avail of such incentives, potential transfer pricing issues within proposed fund structures, GST implications on fund management services and potential common reporting standard implications arising in a fund structure.
- **A high net worth family based in Singapore:** Advising a high net worth family based in Singapore that owns a chain of restaurants and has investments within and outside Singapore, on the tax aspects of a structuring of a family trust.
- **Industry body representing trustee companies in Singapore:** Advising on whether transactions within a trust should be subject to transfer pricing rules and proposed changes to the existing transfer pricing legislation in the Singapore Income Tax Act.

Your Key Contacts

ASEAN



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