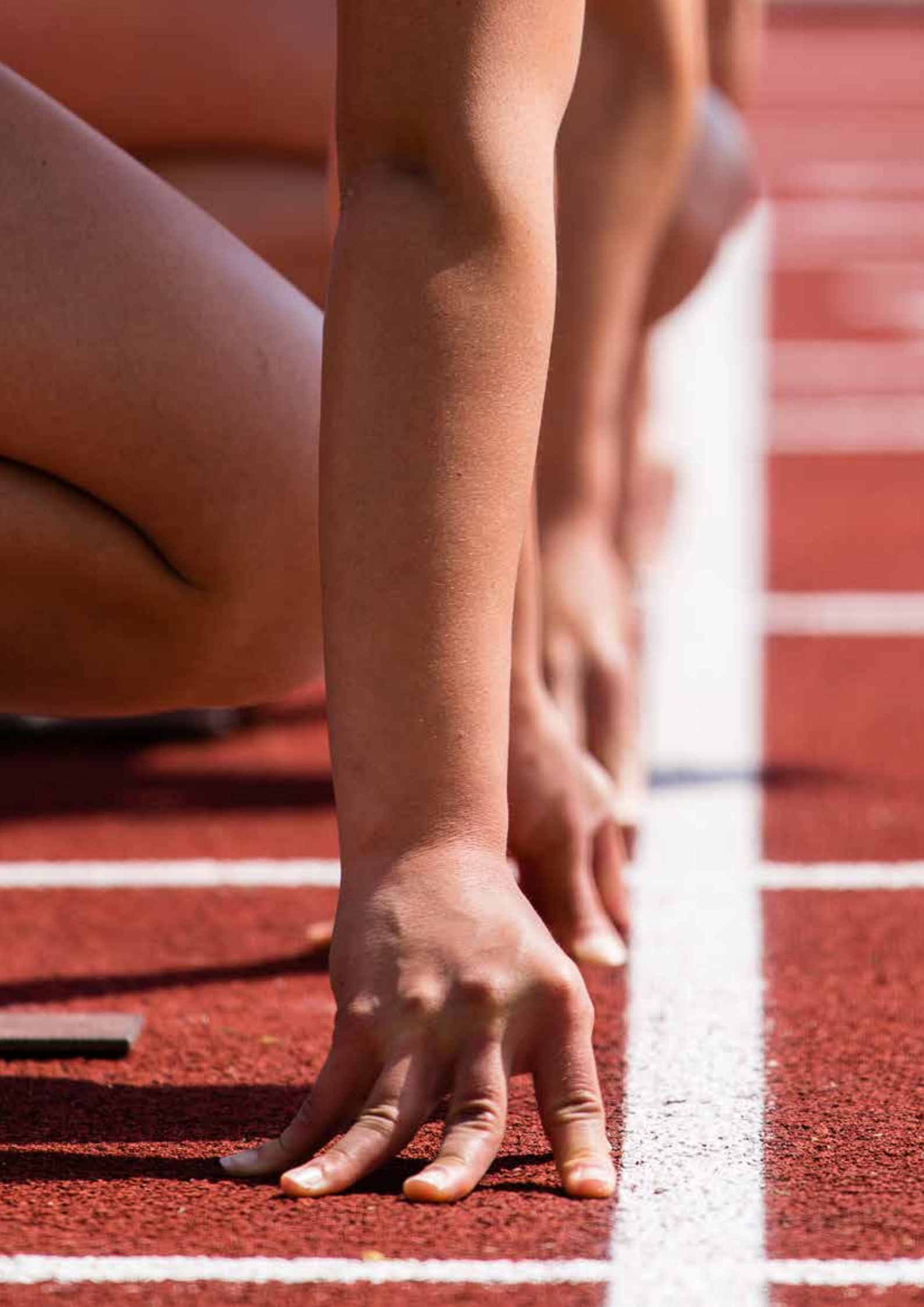


# ***Tax Lookout***

An outlook on recent tax changes

May 2015





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## Foreword

With the 28th SEA Games around the corner and a number of performances by international artistes such as Katy Perry and The Piano Guys recently behind us, Singapore has positioned itself as the sports and entertainment hub of Asia. This is consistent with the government's plans to develop a vibrant arts, cultural and sports scene locally, so as to enhance the country's competitiveness in the new economy.<sup>1</sup>

Amidst all the thrills and drama that these events bring, one should not forget to consider the tax implications in how the events are organised, for otherwise it may cause some unintended cash flow and (negative) publicity impact.

There have been a number of reports in Europe of sportspeople being questioned for their tax affairs. Closer home, it was also reported that a concert promoter was prosecuted by the tax authorities for failure to account for tax obligations from hosting visits of public international entertainers for gigs in Singapore.<sup>2</sup>

This issue of *Tax Lookout* considers some of the tax implications from the perspectives of event promoters and public entertainers, as well as the Goods and Services Tax implications for sponsorships. We also share some of the sporting feats of our people. To many of us, exercise is a good way to relax in our pursuit of higher productivity - sport is not just a serious business; it is also good for business.

Hope you enjoy reading this issue of *Tax Lookout*.

Paul Lau

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1 Economic Strategies Committee Report (published February 2010) available at Ministry of Trade and Industry Singapore website <http://www.mti.gov.sg/ResearchRoom/Documents/app.mti.gov.sg/data/pages/885/doc/ESC%20Full%20Report.pdf> (accessed on 15 May 2015)

2 Inland Revenue Authority of Singapore, *Event Promoter First to be Convicted of Failure to Declare and Pay Withholding Tax*, IRAS (4 March 2015) available at IRAS website at <http://www.iras.gov.sg/irashome/page03a.aspx?id=16154> (accessed on 15 May 2015)

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## ***MICE Traps!***

***Authored by***



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The two teams were lined up neatly along the tunnel, ready to step onto the pitch to the accompanying opening music. The team captains exchanged friendly words amidst their jitters. It's a momentous time after all. With the music being played, the commentators announced the FIFA World Cup's opening and the teams took to the pitch, soaking in the adulation from the raving crowd...

Now imagine if Singapore had hosted the FIFA World Cup. This US\$11-billion event was staged in Brazil in 2014, and it's perhaps not far-fetched to think that Singapore could be the main staging country for such an event, though matches could be played regionally, given Japan and Korea's success in doing so in 2002.

### ***Singapore is ready to be a sports hub***

The Asia Pacific sports market is expected to reach an estimated US\$27.6 billion in 2015 from US\$22.7 billion in 2010, according to PricewaterhouseCoopers' *Outlook for the Global Sports Market to 2015*. The Singapore government projects that the sports industry will contribute S\$2 billion to Gross Domestic Product (GDP) by 2015 and create 20,000 jobs.<sup>1</sup> Comparatively, the industry's contribution was S\$1.1 billion in 2004.<sup>2</sup> Aiming to nearly double it by 2015 means it's an area the nation is looking to grow. In fact, the infrastructure and government planning are already in place: the Singapore Sports Hub opened in 2014; there's a Sports Facilities Master Plan as part of Vision 2030 to establish sports facilities capable of hosting major events, enable elite training, and deliver community sport.<sup>3</sup> Along with these initiatives, the Singapore Economic Development Board (EDB) is actively attracting sports management companies to Singapore.

All these have placed Singapore on the international map for sporting events and are set to give the Meetings, Incentives, Conferences and Exhibitions (MICE) sector in Singapore an unprecedented boost. The various world-class events serve to underlie this ambition – see for example the Women's Tennis Association Championships in October 2014, and the upcoming 28th SEA Games in June. At the same time, we see sports management companies such as World Sport Group setting up its global headquarters here.

### ***Engage the relevant authorities***

For sports management companies looking to use Singapore as a base, the first step is to engage the relevant authorities. They could explore with EDB the possibility of an incentive package to support their expansion plans.

Additionally, the Singapore Tourism Board (STB) administers the Leisure Events Fund to sports management companies and other events management companies promoting arts and culture, dining, entertainment, retail and precincts events. Under this scheme, sports management companies could receive funding support of up to 50% of qualifying costs which include costs related to third-party professional services, production, equipment, materials and marketing.

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1 Singapore Economic Development Board, website <http://www.edb.gov.sg/content/edb/en/industries/emerging-businesses/emerging-businesses.html> (accessed 12 May 2015)  
2 Seamus O'Brien, *Singapore is ready to become a sport hub*, World Sport Group website <http://www.wsgworld.com/singapore-is-ready-to-become-a-sports-hub/> (accessed 12 May 2015)  
3 Sport Singapore website <https://www.sportsingapore.gov.sg/about-us/vision-2030> (accessed 12 May 2015)

## ***Beware of the MICE trap: withholding tax***

Sports management companies operating in Singapore should be aware of withholding tax obligations when making payments to different types of non-residents which sometimes may not be straightforward:

1. A public entertainer versus a professional
2. A person versus an entity
3. Fee for services versus royalty

### ***1. A public entertainer versus a professional***

It is important at the outset for a company to determine to whom it is making payments. Public entertainers include artistes, athletes and musicians. External coaches, personal trainers and other professionals who provide consultancy services for sporting events will not be regarded as public entertainers. Instead, they will be regarded as professionals if they are carrying on a trade or business. Both public entertainers and professionals will be regarded as non-residents in Singapore if they are in Singapore for fewer than 183 days in a calendar year. The domestic tax exemption for short term employment (i.e. those who exercised an employment of not more than 60 days in Singapore) does not apply to public entertainers and professionals.

The difference between payments made to a non-resident public entertainer and a professional is important due to the difference in withholding tax rates. Withholding tax of 10% is applicable to payments that are due and payable to the non-resident public entertainer,<sup>4</sup> while a withholding tax of 15% is to be withheld on the gross income payable to a non-resident professional.<sup>5</sup>

### ***2. A person versus an entity***

Artistes and athletes may be employed by entities. Under section 40A(4) of the Income Tax Act (ITA), a public entertainer is defined to mean, “a stage, radio or television artiste, a musician, an athlete or an individual exercising any profession, vocation or employment of a similar nature”. This means, those who are providing services under an employment contract are included. Under section 45GA of the ITA, those who are making payments to any non-resident public entertainer for the entertainer’s services rendered in Singapore will be required to deduct withholding tax.

### ***3. Fee for performances versus royalty***

Sporting events are closely linked to performances by various artistes, especially in the opening and closing ceremonies. Sports management companies may be given the task of promoting such performances in the media and advertising collaterals prior to the sporting event to generate sales and awareness for the event. Such promotional activities would entail the use of the artistes’ trademarks (e.g. brand names, logos, etc.). In most

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<sup>4</sup> Based on the Income Tax (Amendment) Act 2014, the reduced rate of 10% will be extended for another five years to 31 March 2020.

<sup>5</sup> Alternatively, non-resident professionals can opt to be taxed at 20% on their net income.



double taxation agreements, the term “royalties” is defined to include payments of any kind received as consideration for the use of trademarks. Thus, in this case, would the appearance and performance fee made to the artistes constitute royalty or a performance fee? The nature of the payment is crucial in determining the amount of tax to be withheld as well as the applicable articles in tax treaties.

Sports management companies should thus consider inserting a separate clause in their agreements with the artistes, segregating the fee associated with the use of the artistes’ trademarks from appearance and performance fee. In cases where the use of the trademarks is granted to the sports management company royalty-free, the clause in the agreement should specify that the right to use the artistes’ trademarks has been granted to the sports management companies at no cost for marketing and promotional purposes only in conjunction with the artistes’ appearance and performance at the event. Doing so may provide some clarity on the nature of the payment and the applicable withholding tax rates. However, one should note that (to date) no similar issues have been tested in the Singapore courts though there are overseas tax cases which have dealt with similar issues.

## *Conclusion*

With the expected influx of sports management companies into Singapore and the MICE industry, these are some of the key areas that such companies should be aware of when making payments to non-residents. There are no straightforward answers to some of these issues and it would be wise to seek professional advice on such types of payments before falling into any of the tax “traps”.

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## ***Beware the GST curve ball when negotiating that sponsorship deal***

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As the Champions league moves into the final stages of the knock-out phase, the football fanatics among us have been staying up in the wee hours to watch their favourite teams live in action. It is timely, therefore, for us to turn our attention to one of the key activities behind the scenes which allow the organisers to bring any major sporting and entertainment events to fruition. Without the support from sponsors, some events may not be financially viable relying on ticket and merchandising sales alone.

Typically, there is the usual flurry of corporate sponsorship activity, months or even years ahead of events ranging from the FIFA World Cup, the Formula One race down to Singapore's very own S-League. Due to the widespread appeal of these events, corporates often see sponsorship deals with the event owners as an effective tool to build brand awareness and provide the visibility they need to showcase their brands to existing and new customers.

What is not apparent is the inevitable need to consider and fully understand the Goods and Services Tax (GST) implications when negotiating that exclusive sponsorship deal, whether you are the sponsor or the party requesting the sponsorship. With sponsorship deals typically ranging over several million dollars for large scale events (Singapore Airlines took over as the new title sponsor for the Formula One Singapore Grand Prix in a deal estimated to be worth S\$15 million annually), failure to understand the GST implications can result in nasty surprises down the road.

### ***Sponsorship in the form of cash***

Sponsorships are seldom given on a goodwill basis and often come with strings or conditions attached. Typically, the deal will entail the recipient providing things such as advertising, signage, naming rights or other benefits to the sponsor in return for the sponsorship.

From a GST perspective, this means that the recipient is making a supply for which the sponsorship (whether in monetary or non-monetary form) constitutes consideration. The recipient has to account for GST at the standard rate of 7% on the open market value (OMV) of the benefits provided (e.g. the supply of local advertising) if it is registered for GST. In the event that the OMV of the benefits rendered in return is not available, the GST would need to be accounted for based on the tax fraction (7/107) of the full sponsorship amount.

This means that the actual monies which can be utilised by the recipient is reduced by the GST liability which would have to be accounted for to the Inland Revenue Authority of Singapore (IRAS) in its GST returns, unless the GST impact has already been considered or mitigated during the sponsorship negotiations.

If the sponsor is registered for GST in Singapore, the recipient should consider negotiating with the sponsor to increase the sponsorship amount by 7% to cover the GST liability. After all and setting aside any cash flow issue on the sponsor's part, there is really no GST cost as the sponsor can claim an input tax credit for the amount of GST liable on the sponsorship amount upon receiving a tax invoice from the recipient (except where the sponsor is a financial institution which has its input tax restricted by virtue of its exempt supplies). A non-registered sponsor would, however, be reluctant to accede to this request as it cannot claim the GST accounted for by the recipient to the IRAS as an input tax credit.



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## *Sponsorship in the form of goods*

Sponsorships are sometimes provided in the form of products / merchandise. A prominent (albeit controversial) example is McDonald's role as an official sponsor of the Olympic Games where it provided food (e.g. hamburgers, fries, etc.) to the athletes.

A sponsorship of products / merchandise by a GST-registered sponsor is a supply made by the sponsor. The sponsor has to account for GST based on the OMV of the goods sponsored even if no money is received from the sponsorship. A sponsorship of goods is still caught under the deeming provisions in the Goods and Services Tax Act and hence subject to GST (with certain exceptions), even if they are provided to the recipient with "no-strings attached".

This area is often overlooked by sponsoring companies as these transactions may not be readily available or captured in the accounting system in the first place and the GST implications are not apparent. As sponsorship activities usually comes under the purview of sales and marketing (and not finance) departments, companies need to review their internal processes to ensure such transactions are identified and reported in the GST returns.

One way to do it is to educate the relevant departments engaged in such activities so that they fully understand the GST implications and the company's GST obligations in this respect. At the same time, the finance team preparing the GST return also needs to be mindful of such transactions and reach out to the relevant departments for verification, if required.

## *Conclusion*

Providing sponsorship to a high profile event is a great way of building brand awareness and fostering brand loyalty, and is a win-win for both the sponsor and the recipient. However, what may start off as a sweet deal may turn sour if the GST implications are not properly considered.



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## Questions to Ask at the Start of the Game

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Sport is a huge business globally, generating revenues of more than US\$100 billion each year. With global sports revenues projected to increase at a compound annual rate of 3.7% between 2010 and 2015,<sup>1</sup> everyone is vying for a share of the pie. It is therefore no surprise that sports today are often treated as a business by many, including sports management organisations and the athletes themselves. As a result, the market has become more competitive, and the rewards to promoters and compensation packages paid to sportspersons have become more varied and complex.

This has naturally attracted the attention of tax authorities worldwide. In recent years, the press has reported on sportspersons such as Sergio Gracia and Andre Agassi who have had to answer to the authorities over their tax affairs.

Singapore is poised to become a prime entertainment and sports destination. With the opening of the Sports Hub, a brand new stadium donning the world's largest dome, and marquee events such as the Women's Tennis Association Finals being held here, we have seen and will continue to see international sportspersons gracing the local scene. Their prize money, appearance fees and other benefits may as a result be taxable in Singapore. If so, the tax burden and tax filing obligations may fall on the sportspersons, their management companies or the local event organisers.

Although Singapore has a much simpler tax system than many developed countries, e.g. the UK,<sup>2</sup> sportspersons and those who make payments to them should nonetheless note some of the following key points to mitigate the risk of becoming involved in unexpected tax disputes.

### Definition of sportsperson

Sportspersons are not specifically defined in the ITA, which simply captures athletes or individuals exercising any profession, vocation or employment of a similar nature under the wider definition of "public entertainers".<sup>3</sup>

We may, however, refer to the Commentary to Article 17 (Entertainers and Sportspersons) of the Organisation for Economic Co-operation (OECD) Model Tax Convention for guidance. The Commentary clarifies that "sportspersons" are not restricted to participants in traditional athletic events (e.g. runners, jumpers, swimmers).<sup>4</sup> Golfers, jockeys, footballers, cricketers, tennis players and racing drivers, among others, are thus included.

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1 "Changing the game – Outlook for the global sports market to 2015" [http://www.pwc.com/en\\_gx/gx/hospitality-leisure/pdf/changing-the-game-outlook-for-the-global-sports-market-to-2015.pdf](http://www.pwc.com/en_gx/gx/hospitality-leisure/pdf/changing-the-game-outlook-for-the-global-sports-market-to-2015.pdf)

2 Singapore adopts a partial territorial tax system while the UK is on a worldwide tax system.

3 "Public entertainers" is defined under section 40A(4) to mean, "a stage, radio or television artiste, a musician, an athlete or an individual exercising any profession, vocation or employment of a similar nature." Hence, this hence includes sportspersons who are exercising their profession or employment in Singapore.

4 OECD (2014), Model Tax Convention on Income and on Capital: Condensed Version 2014, OECD Publishing, paragraph 5 of the OECD Commentary on Article 17 – Concerning the Taxation of Entertainers and Sportspersons.

## Amateurs vs professionals

Sportspersons may be taxable on any income or winnings from appearances or participation in sports events,<sup>5</sup> although there are exceptions such as in Bobby Moore's case,<sup>6</sup> where a bonus paid to members of England's football team which won the World Cup in 1966 was held to be in the nature of a gift. Another exception to this rule is usually made for amateurs, who are not generally taxable. The rules for distinguishing an amateur from a professional, however, vary from country to country. In Singapore, the tax authorities have clarified that it does not require tax to be withheld on the prize winnings of an amateur, and that whether or not a sportsperson is an amateur or professional would depend on the international sporting codes or standards.<sup>7</sup> However, in a market where sportspersons can earn millions in endorsement or appearance fees other than prize money, it would be prudent to consider the nature of various payments and the circumstances in which they are derived.

## Types of receipts

Prize money and appearance fees are normally considered to be compensation for personal services, i.e. part of the sportsperson's business or professional receipts or as employment income (where the individual is under a contract of employment with a club).<sup>8</sup> This could include remuneration for time spent on rehearsals and training, as well as time spent travelling for the purposes of performances, rehearsal and training, regardless of whether the preparation is related to specific public performances taking place in that country.<sup>9</sup>

The treatment of endorsement fees for the use of the sportsperson's name or image may be more complex. In *Goosen v. Commissioner*,<sup>10</sup> the US court agreed that Mr Goosen's name and image had a value beyond his skills as a golfer. TaylorMade contracted with Mr Goosen to exploit his image on and off the course as a brand ambassador, and wanted to be associated with his "cool" demeanour, as well as his golfing ability. The court ruled that 50% of Mr Goosen's endorsement contract with TaylorMade should be apportioned to personal services and the other 50% to royalty income. In practice, it is often not easy to determine the right percentages to apply to the two different categories.

Another case, *Garcia v. Commissioner*,<sup>11</sup> similarly involved a golfer and dealt with a similar issue, i.e. ascertaining the right portion to be allocated to image rights and personal services. As would be expected, the outcome of the two cases was consistent even though the exact percentages allocated to personal services and royalty income differed.

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<sup>5</sup> *Kelly v. FCT* 85 ATC 4283

<sup>6</sup> *Moore v. Griffiths* 48 TC 338

<sup>7</sup> FAQ, IRAS website at [http://www.iras.gov.sg/irashome/page04\\_ektid3706.aspx](http://www.iras.gov.sg/irashome/page04_ektid3706.aspx) (accessed on 15 May 2015)

<sup>8</sup> Definition of "public entertainers" under section 40A(4) covers compensation received by way of an employment and the OECD Model Tax Convention: Commentary on Article 17 also clarifies that regardless of whether the income is business or employment nature, such income are taxable in the country where the activities are performed.

<sup>9</sup> OECD (2014), Model Tax Convention on Income and on Capital: Condensed Version 2014, OECD Publishing, paragraph 9.1 of the OECD Commentary on Article 17 – Concerning the Taxation of Entertainers and Sportspersons.

<sup>10</sup> *Goosen v. Commissioner* 136 T.C. 547 (2011)

<sup>11</sup> *Garcia v. Commissioner* 140 T.C. No. 6 (2013)



These cases illustrate that there is a distinction between the two categories of income, and the difficulty in finding the right allocation. Whether the US cases will be followed by the Singapore Courts remains to be seen.<sup>12</sup>

Where it is possible to attribute value to the image rights, the payment may be treated as a royalty, i.e. a payment for a right to use the sportspersons image. The tax implications of the different income characterisations are discussed further below.

### *What does this mean?*

The tax rates for resident individuals, ranging from 2% to 20%, apply in the case of resident sportspersons.

Tax on non-resident sportspersons is levied by way of withholding at the rate of 10% on the gross income that is attributable to the activities performed in Singapore.<sup>13</sup> Payments for the use of image rights, if they are characterised as royalties, are generally subject to withholding at 10% if borne by a Singapore resident or permanent establishment, regardless of where the sportsperson's activities take place.<sup>14</sup>

The Singapore payer (e.g. the event promoter) is responsible for withholding and paying the relevant taxes to the IRAS on behalf of the non-resident sportspersons. The IRAS will seek to recover any underpaid taxes from the payer, and may impose penalties ranging from 5% to 20% for late payments. These may become an added cost to the payer if it has no recourse to the non-resident sportsperson.

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<sup>12</sup> Also see *Agassi v. Robinson* [2006] UKHL23, where the House of Lords held that certain sponsorship fees payable under contracts between the taxpayer and sports companies are taxable in the UK, although none of the contracting parties are resident in or trading in the UK.

<sup>13</sup> Section 45GA of the ITA provides the withholding provisions for payments made to public entertainers, which includes sportsperson.

<sup>14</sup> Section 12(7) and section 45 of the ITA.



## *Are exemptions for short visits available to sportspersons?*

There are provisions in the ITA which exempt the income of a visiting employee of an overseas company. In a case where the employee stays in Singapore for not more than 60 days in a calendar year, income that is sourced in Singapore will be exempt from tax.<sup>15</sup>

Can a sportsperson qualify for this exemption if he is employed by a sports club and receives salaries instead of a fee for services? Unfortunately, the answer to this is “no” as sportspersons are specifically excluded from enjoying this exemption unless the visit is substantially supported by public funds of the government of his home country.

For major sporting events, however, the host country may unilaterally introduce a specific exemption for participating athletes. For example, the UK government introduced a waiver of taxes for foreign athletes who were competing at the 2012 Summer Olympics and the Glasgow 2014 Commonwealth Games to allay concerns by top athletes that they would be worse off if they participated in those events.<sup>16</sup>

## *Will a tax treaty exempt the income of a sportsperson?*

Likely not.

The taxing rights to a sportsperson’s income is assigned in the Article 17-equivalent of Singapore’s tax treaties. The right to tax income derived from the activities of a sportsperson is commonly given to the country in which the individual performs those activities, unless the sportsperson’s visit is directly or indirectly supported wholly or substantially from the public funds of the other country, a political subdivision, a local authority or a statutory body thereof.<sup>17</sup>

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<sup>15</sup> Section 13(6) of the ITA.

<sup>16</sup> Tax Notes International, Country Digest: United Kingdom, February 6, 2012, *Government Waives Taxes for 2014 Commonwealth Games Participants*.

<sup>17</sup> OECD (2014), Model Tax Convention on Income and on Capital: Condensed Version 2014, OECD Publishing, paragraph 8 of the OECD Commentary on Article 17 – Concerning the Taxation of Entertainers and Sportspersons.

Where payments fall within the Royalty Article (i.e. payments for the right to use the person's image or name) of the treaty, exemptions or a reduction in the withholding tax rate may be available.

Those who do not qualify for relief or exemption should not lose heart as they may be able to recover the taxes paid (partially, if not fully) in Singapore, in their home country, through a foreign tax credit claim.

## *Conclusion*

These are some of the implications that sportspersons who are planning to visit Singapore for tournaments should take into consideration:

- Planning is required to mitigate the risk of overseas-sourced income being inadvertently taxed in Singapore. For example, if an overseas-based tennis star were to play a series of matches in the region and signs a multi-million dollar endorsement contract with a sponsor in Singapore, he should consider the tax implications before signing the agreement as the income may be considered sourced in Singapore on the basis that it is contracted here (or that royalties are borne by a Singapore payer). The issue of where the income is sourced is not always a straightforward one.
- Another question which is often asked is whether endorsement payments received by a sportsperson can be treated as "royalty" since it is a payment for the use of the person's image rather than a payment for services. Where there is an element of both, the issue becomes one of apportioning the payment to the two categories.

***Get to know us!***

A decorative graphic consisting of ten dark red circles of varying sizes arranged in a loose, vertical cluster on the right side of the page. The circles are semi-transparent and overlap slightly.

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## **Chris Woo – Tax Leader**

Chris Woo, who took up the role of Tax Leader in October 2014, shared his thoughts on the role, his past experience and some personal interests:-

**Q: Tell us about your position and responsibilities as the Tax Leader.**

**A:** My role as a leader is to help create the most respected, go-to team for business solutions. I will focus on helping our people to become PwC professionals who understand their clients' business strategy and what is important to the clients' stakeholders. As PwC professionals, we then apply our expertise to create value for the clients.

However, such a challenge cannot be met alone. We must work as a team with our peers and leaders. I will work hard to build a team that harnesses the power of client relationships and the experience of industry or subject matter experts. They bring depth of knowledge and can share how they have added value to a similar client. We are stronger when we work together.

**Q: You previously gained experience working in the M&A tax team in the London office of PwC UK. What did you learn from your time there?**

**A:** The partner who led the team in London was a great mentor who believed in me. He trusted me to perform better than I ever thought I could. He gave me enough space to grow but was also there to guide and encourage. I not only gained valuable tax skills but learnt how to build a team – and also had loads of fun!



*Chris Woo is PwC Singapore's Tax Leader*



*When he's not working, Chris enjoys mountain biking*

**Q: What are the issues that our clients are experiencing and how are we supporting them?**

**A:** Our clients are facing – and will continue to face – challenges finding value in new markets, such as those in Asia. They will be confronted with a more regulated environment with huge compliance demands, including aggressive tax authorities.

**Q: What is your life motto?**

**A:** Treat others the way you want to be treated. Be respectful and you will be respected.

**Q: Outside of work, what are your hobbies and interests?**

**A:** I love to cook, run, mountain bike and ski. When my kids are old enough, I hope we can all go scuba diving together.

**Q: Tell us something interesting about yourself.**

**A:** There is almost nothing more enjoyable than having a glass of wine and cooking in my kitchen with friends around me. It allows me to connect with everyone in my home. I like cooking rustic French or Italian, but I also focus on Cantonese, especially for family gatherings.

**Q: Tell us one thing that most people don't know about you.**

**A:** I often like to shave after I have had a nice meal with lots of good wine. Don't ask me why. But those who know me well will know that when I shave, it is not a small matter.



*Chris with his family – Elaine, Rachel and John*



## Florence Loh – New Experiences

### ❖ Complete this sentence. I am happiest when I...

am in the company of my siblings and our cat, Bubu.

### ❖ Three words your closest friends would use to describe you?

Happy. Analytical. Impactful.

### ❖ What three words would your clients most use to describe you?

Solutions-driven. Committed. Pro-active.

### ❖ What is the best thing about becoming a partner?

More control and autonomy from a career perspective, ability to influence and make positive changes - and that aside.... also, having a secretary!

### ❖ What's one thing you value about being part of PwC?

Being surrounded and challenged by smart people, and working for challenging clients. The integrated network and ability to execute as we focus as OneFirm.

### ❖ Thinking about brands out in the market, name three brands that most resonate with you (e.g. MasterCard...)

- Red Bull – positioned as a lifestyle choice, not just an energy drink.
- Bang & Olufsen - distinctive, designed to stand out.
- Google – it is everywhere and has made its way into becoming a verb.



Florence with her cat, Bubu



Florence Loh – Partner in PwC Singapore

### ❖ What is one value you live by?

Integrity.

### ❖ What is one thing you really want to achieve as a partner?

To lead with value in mind.

### ❖ If you can have a theme song, which song would you choose, and why?

“We are the Champions” – The spirit of fighting till the end!

### ❖ What did you aspire to be when you were young?

Someone who can make a difference, even in the littlest thing.

### ❖ What is one of the coolest inventions?

iRobot - no more vacuuming!

## ***Our very own sports enthusiasts***

We asked some members in the Tax team who have keen interests in sports to share their views and achievements. Here are their responses:

### **Q: Which sport(s) do you represent the firm in, or participate in during your personal time?**

Tia Siew Nam, Associate Director (TSN)

Tan Cheng Wen, Senior Manager (TCW)

Eugene Lim, Senior Tax Consultant (EL)

Jackson Lim, Senior Tax Consultant (JL)

Mark Huang, Tax Consultant (MH)

**TSN** I am part of the Ladies Futsal team representing PwC at the ISCA games. Outside of work, I have my regular weekend futsal games with friends as well as tennis lessons every Friday. I also try to squeeze in some short jogs during the week but this had been erratic at best.

**TCW** I like to play most games! But on a regular basis, they would be floorball and soccer. I also represent the firm in these two sports in the annual CPA games.

**EL** I am part of the PwC softball team and also play softball during my personal time. Besides playing softball, I run and go to the gym during my free time.

**JL** I cycle quite frequently during my personal time.

**MH** After suffering from two slipped discs, I am not as active in sports as before. However, during my personal time, I will still do some running as well as going to the gym.



*Cheng Wen (2nd row: 3rd from right) and Siew Nam (1st row: 2nd from right)*

**Q: How often do you take part in the sport(s) and what do you enjoy most about it?**

- TSN** Definitely the social aspect. I prefer team sports as they also allow me to interact with my friends at the same time. Apart from that, it is also the euphoria that I get out of the games. Ever since I started my weekend futsal games a few years back, I stopped having Monday blues as the euphoric feeling gets carried into the start of the work week.
- TCW** I joined an external floorball team so in-season we train every Wednesday and have a game every Saturday / Sunday. I also play soccer every Sunday with a group of regular (girl) friends. What do I enjoy most? The feeling of not thinking about anything except the game in hand. It is physically taxing yet relaxing for the mind.
- EL** At least twice a week. I like the feeling of training, competing and winning together as a team.
- JL** I usually cycle about once or twice weekly. Cycling allows one to relax... having the soothing wind brush across your face while enjoying scenic views goes a long way towards stress relief. Furthermore, it is an activity that is easy to organise i.e. as all my friends are working/have their own families now, it is not always easy to gather many people to do sports. Cycling is versatile, it can accommodate many people if required and is still fun to do even when I'm alone.
- MH** I will visit the gym about three times a week and run at least once a week. I used to play football every week and enjoyed being competitive and active. Additionally I loved the sport and the dynamics of it.



*Jackson in his cycling attire*

**Q: Tell us what has been your greatest achievement?**

- TSN** Probably being able to participate and complete a half marathon is already an achievement for me.
- TCW** I guess being named (wo)man of the match for the last game of this season's floorball league. After the debrief, our coach came up to me and said she agreed with the referees' decision and she thought I did well in playing the ball up and working as a team. I was happy as I've always felt that it's more important to play well as a team than individually. And of course it feels good to know that you are constantly improving.
- EL** Being part of the PwC Softball team that won the CPA / ISCA championship three years in a row and taking part in the JP Morgan Championship run in London last year.
- JL** I've cycled about half of Singapore in a single day! There have been several occasions where I've arranged with friends to do island-wide cycling. It was tiring but extremely satisfying.
- MH** To be part of the PwC team that got crowned ISCA soccer champions in 2012.



*CPA games – Eugene (2nd row: 4th from left)*



*Eugene in action*



*JP Morgan  
Championship London  
Team – Eugene  
(2nd from left)*

## Q: What keeps you motivated to exercise regularly?

**TCW** It helps me lose weight ? Actually I'm lucky to have a group of like-minded friends who all love to play. We see "exercising" more as spending time playing a game together as opposed to exercising, so to us, it's fun! In my floorball team, I am the oldest player and half the team are still schooling! But when we are having fun together, age really doesn't matter.

The trick is not to stop exercising! Once you stop you will start giving yourself 101 excuses not to start again... Come on, it's time for YOU to start playing some games!

**EL** Exercise helps to relieve stress and keeps the mind focused and alert.

**JL** I believe everyone needs a bit of exercise. It keeps you fit so that you can perform at work and take care of your loved ones. It is also a great way to unwind. Further, I have made many friends through cycling and that's a priceless incidental benefit to have.

**MH** To look and be healthy. I also love to exercise as it gives me satisfaction to always overcome physical challenges.

It also allows me to sleep better.



*Mark during his gym workout*

## Q: Siew Nam, you have done some runs and even travelled to join the runs organised overseas. What motivates you to keep up with the long distance runs?

**TSN** Running or jogging has never been something I enjoy naturally as they are simply boring. Yet these are very efficient exercises. So I guess joining organised runs gives me a reason and ensures such boring exercises make their way into my lifestyle. Also, joining overseas runs gives a more positive spin in the form of a purposeful holiday. And especially when so much has been spent to participate in an overseas run, one will make it happen. I have skipped a handful of the local runs after signing up for them.



*Mark during his football session*

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For the love of travel and sports, our very own Charles Collett, Senior Tax Manager with the Global Structuring team, headed to Brazil to catch the World Cup fever last year. He shares his experience below.

## ***Brazil - the land of soccer, beauty and diversity***

Riots. Strikes. Tourist attacks. Unsafe stadiums. Non-existent infrastructure. This was apparently going to be the 2014 World Cup in Brazil.

The world press make a habit (indeed a profession) out of controversy and melodrama before all major sporting events, but even a press-sceptic like me could be forgiven for thinking that visiting Brazil during the World Cup would be like visiting Iraq during operation “shock and awe”. So, with a mix of excitement and trepidation, we packed up our cases for a couple of weeks in the trenches. But what was the reality from the front line?

Well let me start by saying that Brazil is a beautiful country. Diverse people, diverse geography, diverse cuisine, and a zeal for life which is palpable everywhere you go. It is difficult not to be seduced by a nation which has so much to offer. But, how did this enticing country handle its moment in the spotlight?



*Charles (far left)*

Despite the ominous press build up, my overall experience was of a host nation which was physically well prepared, but psychologically a little less so. It was clear some of the promised infrastructure had not quite been completed on schedule. There were times when things seemed at risk of bursting at the seams. And security was obviously beefed up way beyond its normal capacity to minimise negative publicity. However, all of this is no different than I would expect from any country hosting an event of this scale.

But even in the face of this adequate preparation many Brazilians I spoke to seemed to be suffering from a very tangible insecurity about their ability to throw this party. Conversations involved unfavourable comparisons with less developed countries. There was genuine disbelief that all our travel had gone without a serious hitch (which it had). And the sheer mention of any minor problem was met with resignation and glum assertions that things are just like that in Brazil.

National scepticism also seemed to apply to the national team. Dreams of being surrounded by wild hordes of Samba-playing fans during Brazil games were optimistic. The reality was generally tense and slightly subdued home crowds. As it turns out, this particular scepticism may arguably have been closer realism (it certainly was not a classic Brazil team). But as an embarrassed England fan I am not going to cast too many stones in that direction.

On the pitch you could argue this World Cup produced one of the best group phases ever, and some of the most memorable results (Brazil v. Germany, and Spain v. Netherlands being obvious highlights). The fact that after the first week some of the very same world press were already heralding it the best ever tournament is an irony which was hopefully also appreciated by some.

So, take it from me Brazil, you should be secure about your ability to throw a good party in your spectacular country. Indeed, if Tax Lookout ever asks me to report on Carnival from PwC Brazil's Rio De Janeiro office, I may be a very contented man...



*Charles enjoying a stroll along a beach in Brazil.*

## ***Sporting Quiz - How much do you know?***

**1. Who is the youngest player that ever scored in the FIFA World Cup?**

- A. Divock Origi
- B. Pelé
- C. Norman Whiteside
- D. Roger Milla

**2. In what year did Tiger Woods begin his professional golf career?**

- A. 1996
- B. 1998
- C. 1989
- D. 2000

**3. What was the first sporting event held at the Singapore Sports Hub?**

- A. Tennis' WTA Championships
- B. Rugby's World Cup 10s
- C. ASEAN Football Federation Suzuki Cup
- D. ASEAN Basketball League

**4. What is the colour of tennis balls used at official tennis tournaments?**

- A. Green
- B. Yellow
- C. Grey
- D. Any colour

**5. A golfer whose handicap is zero is called a:**

- A. Bogey golfer
- B. Rugby's World Cup 10s
- C. ASEAN Football Federation Suzuki Cup
- D. ASEAN Basketball League

**6. Singapore won its first medal at the Paralympics Games held in:**

- A. London
- B. Beijing
- C. Seoul
- D. Malaysia

### Terms & Conditions

- 1) Please submit your answers to [pwcevents@sg.pwc.com](mailto:pwcevents@sg.pwc.com) by Friday, 3 July 2015.
- 2) Employees of PwC and their immediate families are not eligible to participate.
- 3) The first correct entry will win a bottle of wine. The winner will be notified via email and the prize must be claimed latest by 9am, 31 July 2015.



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