

Singapore Tax Congress

Navigating Today's
Complex Tax Landscape

Parkroyal Collection Marina Bay
Friday, 14 August 2026
9.00am to 5.30pm

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The OECD Transfer Pricing Journey – What Comes Next

This Fireside Chat discusses the evolution of transfer pricing guidance from the 2010 OECD TPG revision through the BEPS updates (2017–2022). It links the TPG to profit attribution for permanent establishments, examines the retroactive impact of successive revisions and looks ahead to the OECD's next steps.

Speaker

Caroline Silberstein, Partner, Baker McKenzie and former Head of the OECD Transfer Pricing Unit

Moderator

Allen Tan, Deputy Chair, SCTP

One Tax System, Two Lenses: Authorities and Taxpayers

Explore how policy choices are calibrated to suit our nation's unique economic needs. Gain insights into where taxpayer expectations align or clash with regulatory approaches in a conversation bridging policymakers, administrators and industry leaders.

Panellists

- Kwan Chang Yew, Head of Group Tax Advisory, OCBC
- Evelyn Lio, Assistant Commissioner, Corporate Tax Division, IRAS
- Elyza Peh, Vice President, Group Tax, PSA International
- Melvin Song, Head of Group Tax, CapitaLand Investment Limited

Moderator

Yong Sing Yuan, Transfer Pricing Partner, KPMG in Singapore

Ethics in Tax: Navigating Tough Calls

Step into the ethical “grey zones” tax professionals face daily amid shifting global standards, business pressures and regulatory expectations. Explore frameworks for navigating dilemmas, managing pressure and making defensible decisions in complex, real-world situations.

Panellists

- Koh Puay Hoon, Head of Tax Advisory, RSM Singapore
- Caroline Lee, Former Deputy Chair, International Ethics Standards Board for Accountants (IESBA)
- Lennon Lee, Tax Leader, PwC Singapore
- Rohan Solapurkar, Tax & Legal Leader, Deloitte Singapore

Moderator

Melvin Yong, CEO, SCTP

AI Transforms Tax

Discover how AI is reshaping tax compliance, controversy management and advisory work in an increasingly digital and data-driven environment. Hear about practical strategies for leveraging AI in daily tax functions.

Panellists

- Amy Ang, Singapore Head of Tax and Asean Managed Services Leader; Partner, Ernst & Young Solutions LLP
- Clinston Chiok, Associate, Baker McKenzie Wong & Leow
- Liao Jie Hong, Partner, Digital Tax Leader, PwC Singapore
- Robin Ng, Assistant Commissioner / Chief Data Officer, Data & Digital Ecosystems Division, IRAS

Moderator

Melvin Yong, CEO, SCTP

The Practitioner's Brief: Income Tax & GST

Get exclusive insights into the key issues discussed at recent IRAS-SCTP dialogues. Hear from SCTP technical committee chairs as they unpack technical discussions, share diverse viewpoints, and reflect the range of perspectives surfaced through these engagements.

Panellists

- Paul Lau, Chair, SCTP Tax & Levies Committee
- Leung Yew Kwong, SCTP Technical Experts Panel
- Evelyn Lim, Chair, SCTP SME Tax Committee
- Richard Mackender, Chair, SCTP GST Committee

Moderator

Felix Wong, Head, Technical and Professional Development, SCTP

Deep Dive: GST and Transfer Pricing Spotlight

Breakout Session 1

GST: Managing Risks in a Data Era

Understand how GST risks are evolving in a data-driven world. Explore how InvoiceNow and e-invoicing can be effectively integrated into your organisation's processes, and how to adopt the right technologies for audit readiness without over-engineering.

Panellists

- Chew Boon Choo, Asean and Singapore Indirect Tax Leader; Partner, Ernst & Young Solutions LLP
- Eu Chin Sien, Executive Director, Head of Goods & Services Tax, BDO Singapore
- Cheryl Van Der Hor, Regional Head of Indirect Tax, APAC, AP Moller-Maersk
- Xu Dingjiao, Director, GST Division - Wholesale Trade Branch, IRAS

Moderator

Richard Ong, Partner, Goods & Services Tax, RSM Singapore

Breakout Session 2

Transfer Pricing's New Frontier: Audit Triggers, Documentation Defence and Dispute Prevention

Dive into the audit triggers that draw scrutiny from tax authorities and understand the factors that increase risk exposure. Hear how practitioners manage transfer pricing complexity, maintain compliance and mitigate risks effectively in an era of heightened scrutiny.

Panellists

- Mercyn Ang, International Tax Manager, Olam Agri & Olam Group
- Avik Bose, Transfer Pricing Partner, Deloitte Southeast Asia
- Adriana Calderon, Managing Director, Asia and Malaysia, Transfer Pricing Solutions Asia
- Lee Jingyi, Transfer Pricing Partner, KPMG in Singapore

Moderator

Edwin Leow, Head of Tax, CLA Global TS



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Panellists' Bios



Tay Hong Beng ATA (Income Tax)

Chairman
SCTP

Hong Beng has more than 30 years of experience in consulting in the real estate sector and is heavily involved in advising on complex tax issues including structured transactions, M&A deals, corporate and financing restructuring, international tax planning and investment projects. He was a key advisor to several high-profile real estate transactions and tax disputes resolution assignments in Singapore.



Ow Fook Chuen

Commissioner of Inland Revenue and CEO
IRAS

Fook Chuen is Commissioner of Inland Revenue (appointed February 2025). He has held senior leadership roles across the public service, including Accountant General, and key positions in MTI, MOF and ACRA spanning industry, governance, investment and policy development. He also chaired SMU's Accountancy Advisory Board and contributed to national accounting standards. He was awarded the Public Administration Medal (Gold) in 2024.



Caroline Silberztein

Partner
Baker McKenzie
Former Head of the OECD Transfer Pricing Unit

Caroline heads Baker McKenzie's international tax and transfer pricing practice in France. She assists multinational clients in risk assessment and management, transfer pricing policies, documentation drafting, as well as tax audits, litigation, mutual agreement procedures / arbitration and advance pricing agreements, both locally and globally. Caroline was the Head of the OECD Transfer Pricing Unit from 2001 to 2011.



Allen Tan ATA (Income Tax) and ATP (GST)

Deputy Chair
SCTP

Allen supports the international and domestic tax needs of Global Fortune 500 companies, investment funds and major conglomerates. He advises on tax governance, policy shifts, regional tax risk management and cross-border tax controversies. He shapes tax dialogue in Asia Pacific, bringing together legal and tax insight with commercial strategy. Allen is also a board member of SCTP.

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Kwan Chang Yew ATA (Income Tax)

Head of Group Tax Advisory
OCBC

Chang Yew oversees all tax matters across OCBC Group. Prior to this, he was the Head of Group Tax at local bank and held key tax positions in global banks. Chang Yew started his career with IRAS, and then with MAS. He currently chairs the tax committee of the Association of Banks in Singapore, and also serves on several boards.



Evelyn Lio ATA (Income Tax)

Assistant Commissioner, Corporate Tax Division
IRAS

Evelyn is the Assistant Commissioner of IRAS's Corporate Tax Division, overseeing income tax matters for medium and large corporations, corporate income tax policy, technical advice, and BEPS Pillar Two. She was previously Assistant Commissioner of IRAS's International Tax and Relations Division and was Singapore's Competent Authority for tax treaty, transfer pricing, and exchange of information matters, and has also worked at the OECD.



Elyza Peh ATP (Income Tax)

Vice President, Group Tax
PSA International

Elyza leads global tax strategy, compliance, and governance across multiple jurisdictions at PSA International, a leading global port group and supply chain solutions provider. With deep expertise in international tax, transfer pricing, BEPS Pillar Two implementation, and significant M&A experience, she navigates how tax regulations are applied in local contexts, balancing regulatory intent with commercial realities to achieve tax certainty.



Melvin Song ATA (Income Tax)

Head of Group Tax
CapitaLand Investment Limited

Melvin is Head of Group Tax at CapitaLand Investment Limited, a role he assumed in 2022, after serving as Vice President, Group Tax at CapitaLand Limited since 2008. With nearly 30 years of tax experience, he has extensive expertise in tax governance, compliance, planning and cross-border tax matters for large Singapore-based multinationals, bringing practical insights into implementing tax policies across complex regional operations. Melvin is also a board member of SCTP.

Panellists' Bios



Yong Sing Yuan ATA (Income Tax)

Transfer Pricing Partner
KPMG in Singapore

Sing Yuan has over 20 years of experience in tax policy and international tax, specialising in transfer pricing, dispute prevention and resolution. Formerly the head of IRAS' Transfer Pricing and Dispute Resolution branch, she was active in bilateral negotiations on TP issues. She was a member of the UN Tax Committee of Experts on International Cooperation in Tax Matters.



Koh Puay Hoon ATA (Income Tax)

Head of Tax Advisory
RSM Singapore

Puay Hoon has over 20 years of experience in corporate and individual taxation. She has worked with MNEs on their in-bound investment needs and local companies on domestic and international tax issues, includes advising on corporate group reorganisations, tax treaty interpretations and withholding taxes, M&A transactions involving tax due diligence and tax incentive applications and more. Puay Hoon is also a board member of SCTP.



Caroline Lee

Former Deputy Chair
International Ethics Standards Board for Accountants (IESBA)

Caroline has over 35 years of experience in public accountancy with KPMG. She was a member of the IESBA from 2017 to 2022, setting international ethics and independence standards. In Singapore, she chaired the Public Accountants Oversight Committee's Ethics Sub-Committee from 2021 to 2023 and continues to contribute to national ethics and independence standards through the ISCA Ethics Committee.



Lennon Lee ATA (Income Tax)

Tax Leader
PwC Singapore

Lennon has over 23 years of experience in practising tax and is involved in many international advisory projects and assignments across industries. He also advises MNCs and government entities on cross-border tax and regulatory implications including M&As, corporate restructuring, investments, asset securitisation, leasing, tax based structured products, investment funds and more. Lennon is also a board member of SCTP.

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Rohan Solapurkar ATA (Income Tax)

Tax & Legal Leader
Deloitte Singapore

Rohan has over 27 years of experience in International Tax. Concurrently Deloitte Singapore's Business Tax Leader, he leads the Consumer Products Industry group across Southeast Asia, providing comprehensive tax solutions to clients in Singapore and across the region across a range of industries, including consumer products, real estate, hospitality, infrastructure, and technology. Rohan is also a board member of SCTP.



Melvin Yong

CEO
SCTP

Melvin leads strategic efforts to uplift tax excellence across business, professional practice and the public sector, with 30 years of experience spanning leadership, financial journalism, communications and media. Formerly CPA Australia's Singapore Country Head and an award-winning news anchor, founding presenter and business editor at Channel NewsAsia, he is recognised as a respected voice in Singapore's finance and media landscape.



Amy Ang ATA (Income Tax)

Singapore Head of Tax and Asean Managed Services Leader; Partner
Ernst & Young Solutions LLP

In addition to leading EY Singapore's Tax practice, Amy is also the EY Asean Managed Services Leader and Global Client Service Partner for an Asia-Pacific sovereign wealth fund. She has more than 30 years of experience advising companies in the private equity, funds, and wealth and asset management industries. Amy is also a board member of SCTP.



Clinston Chiok

Associate
Baker McKenzie Wong & Leow

Clinston is an Associate with the Tax and Trade practice group at Baker McKenzie Wong & Leow, focusing on tax dispute resolution and tax advisory practice. He has experience advising multinational technology companies, publicly-listed organisations, and leading consumer goods and retail companies on issues (in dispute resolution and advisory contexts) arising from cross-border planning, corporate restructuring, and mergers and acquisitions.

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Liao Jie Hong PTP (Income Tax)

Partner, Digital Tax Leader
PwC Singapore

Jie Hong is a leading advisor on AI-enabled tax transformation. He works with multinational enterprises to reimagine tax operating models, leverage artificial intelligence and automation, and build data-driven tax functions that enhance efficiency, governance, and strategic decision-making. He advises on tax strategy, regional business expansion, and large-scale transformation programs, helping organisations navigate an increasingly digital and complex tax environment.



Robin Ng ATA (Income Tax)

Assistant Commissioner / Chief Data Officer, Data & Digital Ecosystems Division
IRAS

Robin is the Assistant Commissioner of the Data & Digital Ecosystems Division and concurrently the Chief Data Officer at Inland Revenue Authority of Singapore. He oversees and drives the use of data, analytics, and artificial intelligence to transform organisational processes. He also spearheads initiatives to accelerate the adoption of tax digital solutions among businesses and intermediaries in the tax ecosystem.



Paul Lau ATA (Income Tax)

Chair
SCTP Tax & Levies Committee

Paul is the banking and capital markets as well as the tax policy leader at PwC Singapore, where he works closely with multinationals and financial institutions on corporate and international tax matters. With 30 years of experience in tax, Paul has worked with clients from across industries, including financial services, commodity trading, electronics, information technology, pharmaceutical, professional services and shipping.



Leung Yew Kwong ATA (Income Tax)

SCTP Technical Experts Panel

Yew Kwong is Principal Advisor with KPMG Singapore, where he deals with issues concerning income tax, stamp duty, GST and property tax. Prior to joining KPMG, Yew Kwong was in practice as a tax lawyer for eight years, after leaving IRAS where he was concurrently Chief Legal Officer and Chief Valuer.

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Evelyn Lim ATA (Income Tax)

Chair
SCTP SME Tax Committee

Evelyn has over 25 years of experience in corporate income tax compliance and advisory as both a tax service provider and in-house tax practitioner, including six years in China. Her expertise includes cross-border structuring, M&A/pre-IPO structuring, due diligence and corporate reorganisations. She has also advised clients across various industries on tax incentives applications, audit defence and tax optimisation.



Richard Mackender ATA (GST)

Chair
SCTP GST Committee

Richard has over 25 years of Indirect Tax experience serving both local and multinational companies in Asia Pacific and the UK. He also leads Deloitte's Southeast Asia Indirect Tax practice and specialises in advising large corporates on their indirect tax-related activities, not only from a Singapore GST perspective, but also regarding the wider Asia Pacific VAT/GST issues that arise.



Felix Wong ATA (Income Tax)

Head, Technical and Professional Development
SCTP

Felix has 19 years of corporate and international tax experience across consultancy and industry roles. At SCTP, he leads technical initiatives that bring together key stakeholders to advance the profession and strengthen Singapore's tax ecosystem. He also drives professional development and technical excellence, shaping CPE programmes and facilitating high-level dialogues with tax authorities to enhance tax practice and administration.



Chew Boon Choo ATA (GST)

Asean and Singapore Indirect Tax Leader; Partner
Ernst & Young Solutions LLP

Boon Choo has vast experience in GST compliance, planning and consultancy for local and multinational businesses. She has conducted numerous tax governance initiatives' (ACAP and ASK) reviews for different sectors and advises on e-invoicing requirements by tax authorities. Boon Choo has been a frequent speaker and trainer on GST topics, both internally in EY, and also externally for clients.

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Eu Chin Sien ATA (GST)

Executive Director, Head of Goods & Services Tax
BDO Singapore

Chin Sien has over 25 years of GST experience, having started her career conducting extensive GST audits at IRAS. Prior to her current role, she worked at two Big Four firms and was instrumental in setting up the dedicated GST practice in two of the largest mid-tier firms, including BDO. Chin Sien is also a board member of SCTP.



Cheryl Van Der Hor ATA (GST)

Regional Head of Indirect Tax, APAC
AP Moller–Maersk

Cheryl Van Der Hor is Regional Head of Indirect Tax, APAC at AP Moller–Maersk, with over 27 years of experience in GST and VAT advisory. She specialises in managing indirect tax risk across complex logistics and digitalised business models, with deep expertise in systems, regulatory change, and indirect tax risk management for large multinational operations.



Xu Dingjiao

Director, GST Division – Wholesale Trade Branch
IRAS

Dingjiao is currently Director of GST Wholesale Trade Branch, driving GST InvoiceNow implementation and overseeing GST compliance and data analytics. Previously Director of Valuation & Stamp Duty, she led major policy changes including introducing Additional Buyer's Stamp Duty (ABSD) for Trust. She received the Public Administration Medal (Bronze) (COVID-19) for leading the Rental Relief Framework and Rental Support Scheme.



Richard Ong ATA (GST)

Partner, Goods & Services Tax
RSM Singapore

Richard leads RSM's advisory practice on GST and indirect tax matters across a broad range of industries including real estate & construction, funds and asset management, technology and more. Richard has deep regulatory insight and practical experience with his prior IRAS, Big Four and commercial firm background, giving him a balanced perspective on compliance expectations and commercial realities.

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Mercyn Ang ATA (Income Tax)

International Tax Manager
Olam Agri & Olam Group

Mercyn is an International Tax Manager with over ten years of corporate and international tax experience. As part of the Group Tax team at Olam Agri and Olam Group, he collaborates with finance, business, and cross-functional teams on tax matters, transfer pricing audits, M&A transactions and initiatives. He previously held in-house and consulting roles at Keysight Technologies and PwC Singapore.



Avik Bose

Transfer Pricing Partner
Deloitte Southeast Asia

Avik has over 22 years of experience in transfer pricing planning structures for various business models, supply/value chain realignments, IP valuation, cost contribution arrangements, intercompany financial transactions and planning and executing global documentation projects for multinational corporations. He has extensive experience in TP controversy and represented his clients before revenue authorities in several complex MAP and APA cases.



Adriana Calderon ATA (Income Tax)

Managing Director, Asia and Malaysia
Transfer Pricing Solutions Asia

Adriana has extensive experience with Big Four and mid-tier firms advising multinational companies in corporate and international taxation. As a Transfer Pricing practitioner, Adriana advises companies in the Asia Pacific Region in transfer pricing, international taxation and global minimum tax across all. She is also involved with dispute resolutions, the pricing of financial transactions, business restructures and negotiation of APAs.



Lee Jingyi ATA (Income Tax)

Transfer Pricing Partner
KPMG in Singapore

Jingyi has nearly 20 years of experience working with multinational clients, specialising in transfer pricing planning, documentation, dispute resolution, complex cross border MAPs and APAs, restructuring and operational transfer pricing. Jingyi has supported her clients in tax disputes in Singapore and across the region. She is also the Co-Head of KPMG Singapore's Infrastructure, Government and Healthcare Tax sector.

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Edwin Leow ATA (Income Tax) and ATP (GST)

Head of Tax
CLA Global TS

Edwin has more than two decades of experience in both international and Singapore tax and is equipped with extensive knowledge in providing advisory and compliance services covering all key areas of taxation: Corporate Tax, Individual Tax, Goods and Services Tax, Transfer Pricing and Stamp Duty, making him a proficient tax advisor for issues which cut across a spectrum of taxation matters.