



Lye Yuan Jun
Associate Director, Tax & Private Client Services

LL.B. (Hons), National University of Singapore (2015)
Admitted to Singapore Bar (2016)
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ABOUT YUAN JUN

Yuan Jun advises clients on Singapore tax issues in advisory, transactional and contentious matters. Her experience covers the major tax types in Singapore (income tax, goods and services tax, stamp duty and property tax), cross-border taxation as well as the application of specialised tax regimes to particular sectors.

Yuan Jun assists multi-national corporations in the tax aspects of structuring their business operations and investments in Singapore. She also supports them in a range of transactions including group reorganisation, financing, re-domiciliation and other intra-group arrangements relating to capital structure, intellectual property holding and employee remuneration.

Yuan Jun also assists clients through the various stages of the tax dispute life cycle. She has assisted clients in a variety of sectors, applying the particularities of the business model in each case to the legal arguments in support of the tax treatment.

EXPERIENCE

Yuan Jun has been involved in the following matters:

Tax Advisory

- Advised multinational groups in the pharmaceutical, shipping, cosmetics and agricultural commodities industry on applicable tax incentive regimes
- Represented a major commercial property operator in discussions with IRAS on novel property tax issues.
- Advised the same commercial property operator on complex capital allowance claims.
- Advised on the proposed re-domiciliation of a leading global energy trading group's holding company to Singapore.

- Advised on the application of the GST reverse charge regime to intra-group transactions between a foreign head office and its Singapore branch.
- Advised a technology and consulting company on the withholding tax implications of cloud computing service fees.

Dispute Resolution

- Resolved the characterisation of an intellectual property cost-sharing arrangement which resulted in income tax deductions on over US\$1 billion of payments for our client, a leading payment services provider
- Represented the individual taxpayers in a case before the Income Tax Board of Review on the application of the section 10(1)(g) head of charge under the Income Tax Act to the sale of good class bungalows.
- Secured a favourable resolution on the income tax treatment of a property divestment by a major financial services provider.
- Represented a retail REIT in a case before the Valuation Review Board on the application of the *rebus sic stantibus* principle and property tax valuation methods.

Transactions

- Acted for an SGX-listed property developer in a tender offer exercise for its outstanding notes.
- Acted for a leading pharmaceutical group in its multi-phased group restructuring exercise involving the re-organisation of multiple Singapore entities.

International Tax

- Advised a major international oil and gas player on the domestic and cross-border tax considerations in structuring a multinational group's IP holding structure.

- Successfully persuaded IRAS to adopt a different interpretation of the applicable tax treaty than what IRAS had been applying to the Singapore operations of a foreign financial institution.
- Advised clients on notices from IRAS pertaining to Exchange of Information requests.

APPOINTMENTS/MEMBERSHIPS

- Member, International Fiscal Association, Singapore Branch
- Member, Law Society of Singapore
- Member, Singapore Academy of Law