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Institute of International Trade

# INTERNATIONAL TAXATION

2017-2018

In the present day globalized economic system, international tax professionals will be expected to have a varied background and the flexibility of being increasingly mobile. Being able to understand more than one taxation system will be the need of the hour. Being a mixture of law, administration, and accountancy, tax draws on a huge range of intellectual, presentational, and personal skills. A tax adviser works with companies to create the best strategies for them. Be truly identified as a tax specialist and “fill the gaps” of your knowledge in the field of international tax and other jurisdictions.

## **COURSE HIGHLIGHTS**

- Portable qualification across borders and industries
- Focus on practical (“real-life”) application
- Be identified as a tax specialist

## **FOR WHOM**

- Professionals in the field of taxation, such as accountants, attorneys and financial advisors
- Exporters & Importers
- Graduate level students with an interest in international trade

**DURATION** – 3 Months (24 lectures)

## **FEES –**

- Online – ₹ 7,500
- Classroom – ₹ 15,000

## **COURSE CONTENTS**

### **Module I - Introduction**

1. What is International Tax
2. Goals of International Tax Rules
3. The Role of the Tax Adviser in Planning International Transactions

### **Module II – Jurisdiction to Tax**

1. Model Tax Conventions in General
2. Introduction to tax jurisdiction
3. Defining Residence
4. Source Jurisdiction

### **Module III - Double Taxation Relief**

1. Introduction
2. International Double Taxation Defined
3. Relief Mechanisms
4. Allocation of Expenses
5. Tax Sparing
6. Article 23-A and Article 23-B - Text
7. Referencer: Double Taxation Relief in India
8. Articles 23A and 23B in India's Treaties – Summary

### **Module IV – Transfer Pricing**

1. Introduction
2. Arm's Length Method
3. Determining the income of a branch or permanent establishment of a Corporation
4. Formulary Apportionment and the Future of the Arm's Length Method
5. Current Controversial Issues in Transfer Pricing
6. Note: Transfer Pricing is not just about Taxation
7. The Future
8. Categories of Inter-Company Transfer

**Module V – Anti-Avoidance Measures**

1. Introduction
2. Thin Capitalization Rules
3. Controlled Foreign Corporation (CFC) Rules
4. Offshore Investment Funds
5. Case Study

**Module VI – Tax Treaties**

1. Overview
2. Contents of a typical tax treaty
3. Special Treaty Issues.

**Module VII – Emerging Issues**

1. Harmful Tax Competition
2. Hybrid Entities
3. Electronic Commerce

**CAREER OPPORTUNITIES**

- Work as Tax Consultant in Big 4 accounting & consulting firms
- Work with MNCs to create innovation tax strategies for them
- Work in Government organizations as Tax Advisors
- Practice individually or work in cross-functional organizations