

INTERNATIONAL TAXATION



TARGETS OF SEMINAR

The trainee should:

- 1. Understand the main principles of international taxation regarding the taxability of income.
- 2. Define the cause of international taxation and remedy for solution.
- 3. Determine the methods of relief from international taxation.
- 4. Understand the main principles of international taxation regarding the taxability of income.
- 5. Define the arm's length principle.
- 6. Understand the concepts of tax evasion, tax havens and tax avoidance.
- 7. Determine where the profits of Permanent Establishment are subject to taxation and mitigate the double taxation risk.
- 8. Understand the concept of substance for legal entities and consult the clients on a factual basis.
- 9. Identify the risks arising from transfer pricing and how to use the methods of transfer pricing.
- 10. Determine and interpret the mechanism of resolving of conflicts of double taxation between two or more Countries.
- 11. Be able to understand the double taxation risks associated with Permanent establishment and associated enterprises and co-operate with client to mitigate it.
- 12. Determine the appropriate course of action in the case of double taxation and represent the client to the authorities under the Tax Treaty.
- 13. Interpret the Tax Treaties appropriately and consult the client for its effective application as per the business activities of his/her legal entity

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COST OF SEMINAR:

Initial cost of participation: 345.00 Euro

Subsidy from HRDA: 255.00 Euro

Real cost of participation: 90.00 Euro

THE SEMINAR IS USEFUL FOR:

Accounting and Auditing offices, Investment and Corporate companies, Lawyers, Construction Companies and accounting offices of various companies.

TRAINER DETAILS: Antonis Chrysanthou

Qualifications: FCCA, ADIT and CAT

Experience: Audit of small, medium and big size entities

Preparation of consolidated financial statements

Review of audit files and issue of audit reports.

Tax consultancy, assistance in the development of efficient tax structures, analyzing complex tax schemes and preparation - submission of income tax and VAT declarations.

Compliance officer for AML purposes

Several tax presentations to businesses and provision of ongoing training to adult staff and associated enterprises for accounting, auditing and

tax related matters approximately 120 hours per year since 2010

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STRUCTURE OF SEMINAR

INTRODUCTION – Basic Principles of International taxation

- a. Which jurisdiction to tax? 30'
- b. Tax and Tax Systems 30'
- c. International Double Taxation and Methods to Relief 1 hour

SECTION 2: OECD Model Tax Treaty

- a. Types of DTT, negotiation of Treaties and Domestic Law 30'
- b. Format of the OECD Model tax Treaty and comparison with UN Model 1 hour
- c. Interpretation of OECD Model tax Treaty 4 ½ hours

1. Article 4: Resident

2. Article 6: Income from Immovable Property

3. Article 7: Business Profits

4. Article 10: Dividends

5. Article 11: Interest

6. Article 12: Royalties

7. Article 13: Capital Gains

8. Article 15: Income from Employment

9. Article 22: Taxation of Capital

SECTION 3: Methods of Elimination of Double Taxation

- a. Exemption method and use (Article 23A) 30'
- b. Relief method and how to use (Article 23B) 30'
- c. Practical examples 1 hour

SECTION 4: OECD Model Tax Treaties Other Provisions

- a. Dispute Resolution under Tax Treaties (Article 25) 30'
- b. Non-Discrimination (Article 24) 15'

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- **c. Exchange of Information and assistance in collections of taxes (Articles 26 and 27) 15'**

SECTION 5: Permanent Establishment, Associated Enterprises and Transfer Pricing

- **a. Permanent Establishment: Meaning and tax treatment 1 hour**
- **b. Associated Enterprises and transfer pricing adjustments 30'**
- **c. Arm's Length Principle and methodology of transfer pricing 1 hour**
- **d. Controlled Foreign Companies and Thin Capitalisation Rules 30' heading**

