

Introduction to International Taxation: Principles & Practice

19 – 23 April 2027
Rome (Italy)

UK Training

PARTNER

A photograph of chess pieces on a checkered board. In the foreground, a large gold king piece stands prominently on a dark square. To its left, a silver pawn piece sits on a light square. Further back, another silver pawn piece is visible on a light square. The background features a series of concentric, light gray circles that create a sense of depth and focus on the king piece.

Introduction to International Taxation: Principles & Practice

Ref: 322795_214110 **Date:** 19 – 23 April 2027 **Location:** Rome (Italy) **Fees:** 5200 GBP

Course Description

This intensive 5-day course provides a comprehensive introduction to international taxation principles and practices. Participants will gain a solid understanding of key concepts in cross-border taxation, including tax treaties, transfer pricing, and global tax planning strategies. The course combines theoretical knowledge with practical case studies to ensure participants can apply their learning to real-world scenarios.

Learning Objectives

- Understand the fundamental principles of international taxation
- Analyze and interpret tax treaties and their impact on cross-border transactions
- Gain insights into transfer pricing methodologies and documentation requirements
- Explore strategies for optimizing global tax positions and managing tax risks
- Develop skills to navigate complex international tax scenarios

Course Modules

Day 1: Fundamentals of International Taxation

- Overview of international tax principles
- Residence and source concepts
- Permanent establishment rules
- Introduction to double taxation

Day 2: Tax Treaties and Their Application

- Purpose and structure of tax treaties
- OECD Model Tax Convention
- Treaty interpretation and application
- Limitation on benefits provisions

Day 3: Transfer Pricing Essentials

- Transfer pricing concepts and regulations
- Arm's length principle
- Transfer pricing methods
- Documentation requirements

A graphic of a chessboard with several pawns. In the foreground, a large gold king piece stands prominently. Behind it, several smaller pawns in gold and silver are positioned on the board. The background features concentric circles, suggesting a spotlight or a strategic focus.

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Day 4: Foreign Tax Credits and Anti-Deferral Regimes

- Foreign tax credit mechanics
- Controlled Foreign Corporation CFC rules
- Subpart F income
- GILTI and FDII provisions

Day 5: International Tax Planning and Recent Developments

- Global tax planning strategies
- Base Erosion and Profit Shifting BEPS initiatives
- Digital economy taxation
- Current trends and future outlook

Practical Wins for Participants

- Ability to identify and address key international tax issues in cross-border transactions
- Skills to analyze and apply tax treaty provisions effectively
- Practical knowledge of transfer pricing documentation and compliance
- Insights into optimizing global tax structures and minimizing tax risks

A graphic of a chessboard with several chess pieces (a king, a queen, and a pawn) in the foreground. The board is checkered and has a subtle grid pattern. The text 'UK Training' is in a small font, and 'PARTNER' is in a large, bold, black font.

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