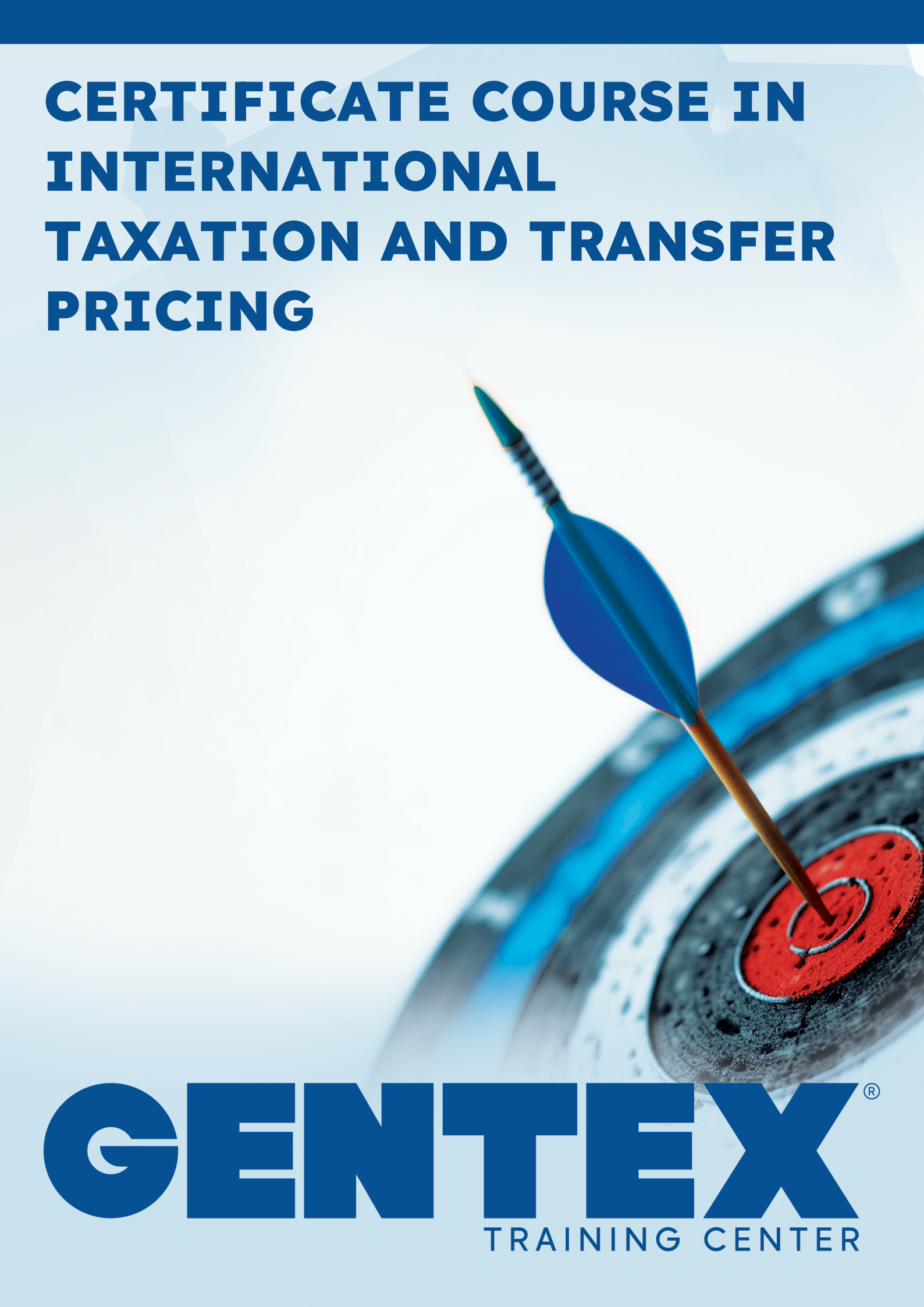
CERTIFICATE COURSE IN INTERNATIONAL TAXATION AND TRANSFER PRICING



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TRAINING CENTER

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Introduction

Certificate Course in International Taxation and Transfer Pricing Training Course builds the technical capability multinational groups need to structure cross-border operations and defend them before tax authorities. International tax rules interact constantly: permanent establishment, withholding taxes, treaty benefits, and transfer pricing all shape the same transaction, and a decision made in one area changes the exposure in another. This course connects them. It covers cross-border taxation principles, treaty application, and permanent establishment analysis. Furthermore, it applies transfer pricing methods, documentation requirements, and dispute resolution mechanisms. In addition, it develops BEPS awareness and compliance governance. As a result, participants manage international tax positions with technical precision and defensible reasoning.

Certificate Course in International Taxation and Transfer Pricing Course Objectives

- Explain international tax principles and cross-border transaction taxation.
- Apply double tax treaties and interpret key articles.
- Analyse permanent establishment and profit attribution issues.
- Apply withholding tax rules to dividends, interest, and royalties.
- Apply the arm's length principle and OECD transfer pricing methods.
- Perform comparability analysis and benchmarking studies.
- Build transfer pricing documentation under BEPS Action 13.
- Apply tax structuring considerations within legal boundaries.
- Manage tax audits, disputes, and competent authority procedures.
- Apply tax compliance governance and reporting standards.

Course Methodology

- Interactive lectures with real international tax and transfer pricing cases.
- Treaty application and permanent establishment analysis workshops.
- Transfer pricing method selection and benchmarking exercises.
- Documentation drafting and dispute resolution practice.
- Structured peer review with facilitator feedback on tax positions.

Who Should Take This Course

- Tax managers and international tax specialists.
- Transfer pricing professionals and analysts.
- Finance and accounting professionals in multinational groups.
- Group tax and compliance officers.
- Tax advisors and consultants.
- Internal auditors reviewing tax compliance and controls.

Certificate Course in International Taxation and Transfer Pricing Course Outlines

Day 1: International Tax Framework

- Sources of international tax law and their hierarchy.
- Jurisdiction to tax and residence versus source principles.
- Double taxation and its economic consequences.
- Double tax treaty structure and the OECD Model Convention.
- Treaty entitlement, residence, and beneficial ownership.
- Treaty shopping concerns and anti-abuse provisions.
- Case study: analysing a cross-border transaction for tax exposure.

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Day 2: Permanent Establishment and Withholding Tax

- Permanent establishment concepts and types.
- Fixed place of business and dependent agent analysis.
- Preparatory and auxiliary activity exceptions.
- Profit attribution to permanent establishments.
- Withholding tax on dividends, interest, and royalties.
- Treaty rate application and relief procedures.
- Workshop: assessing permanent establishment risk in a group structure.

Day 3: Transfer Pricing Principles and Methods

- The arm's length principle and its application.
- Functional analysis of functions, assets, and risks.
- The five OECD transfer pricing methods.
- Comparability analysis and benchmarking studies.
- Interquartile range and arm's length range application.
- Intangible property and DEMPE analysis.
- Workshop: selecting a method and running a benchmarking study.

Day 4: Documentation, BEPS, and Compliance

- BEPS Action 13 three-tier documentation structure.
- Master file, local file, and country-by-country reporting.
- BEPS actions affecting cross-border structures.
- Interest limitation, hybrid mismatch, and treaty abuse rules.
- Tax transparency and exchange of information.

- Permanent establishment and digital economy considerations.
- Workshop: drafting a local file section with supporting evidence.

Day 5: Disputes, Governance, and Tax Risk

- Tax audit defence preparation and evidence files.
- Dispute resolution: mutual agreement and arbitration.
- Advance pricing agreements and their negotiation.
- Tax risk assessment and indicator mapping.
- Tax governance frameworks and internal controls.
- Reporting tax positions to boards and audit committees.
- Course review, assessment, and action planning.

Conclusion

By successfully completing Certificate Course in International Taxation and Transfer Pricing, participants will gain a thorough understanding of international tax frameworks, treaty application, permanent establishment analysis, withholding tax treatment, transfer pricing principles and methods, documentation and BEPS compliance, and dispute resolution and tax governance. They will also acquire practical skills in cross-border tax analysis and treaty application, permanent establishment and withholding tax assessment, transfer pricing method application and benchmarking, and transfer pricing documentation, dispute resolution and tax governance. In addition, the course prepares them to manage international tax positions with technical precision and defensible reasoning. Gentex Training Center delivers this programme with a strong focus on applied international tax practice and defensible compliance positions.

LEARN BOLD. **LEAD BEYOND**
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FAQs for Certificate Course in International Taxation and Transfer Pricing course

Q1 What is the "Certificate Course in International Taxation and Transfer Pricing" course about?

It is a five-day programme on managing cross-border tax positions and intercompany pricing. It covers international tax frameworks and treaties, permanent establishment and withholding tax, the arm's length principle and OECD methods, benchmarking, BEPS documentation, dispute resolution, and tax governance.

Q2 What are the key benefits of the "Certificate Course in International Taxation and Transfer Pricing" course?

Participants produce tax positions that hold up under audit and treaty challenge. The course improves treaty application and beneficial ownership analysis, sharpens permanent establishment assessment, strengthens transfer pricing method selection and benchmarking, reduces documentation gaps and penalty exposure, improves dispute preparation, and raises governance quality for board reporting.

Q3 What skills will I gain from the "Certificate Course in International Taxation and Transfer Pricing" course?

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Participants gain cross-border tax analysis and treaty application, permanent establishment and withholding tax assessment, transfer pricing method application and benchmarking, and transfer pricing documentation, dispute resolution and tax governance. These four skills cover the practical core of international tax and transfer pricing work.

Q4 What tools, methods, or standards are covered in the "Certificate Course in International Taxation and Transfer Pricing" course?

The course covers sources of international tax law, jurisdiction to tax and residence and source principles, double taxation effects, double tax treaty structure, the OECD Model Convention, treaty entitlement and beneficial ownership, treaty shopping and anti-abuse provisions, permanent establishment types, fixed place of business and dependent agent analysis, preparatory and auxiliary activity exceptions, profit attribution to permanent establishments, withholding tax on dividends, interest and royalties, treaty rate application and relief procedures, the arm's length principle, functional analysis of functions, assets and risks, the comparable uncontrolled price, resale price, cost plus, transactional net margin and profit split methods, comparability analysis and benchmarking, the interquartile range and arm's length range, intangible property and DEMPE analysis, BEPS Action 13 and the three-tier documentation structure, master file, local file and country-by-country reporting, interest limitation rules, hybrid mismatch rules, treaty abuse rules, tax transparency and exchange of information, digital economy considerations, tax audit defence preparation, mutual agreement procedures, arbitration, advance pricing agreements, tax risk assessment and indicator mapping, and tax governance frameworks.

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Q5 How is the "Certificate Course in International Taxation and Transfer Pricing" course applied in real-world practice?

Participants apply the methods to their own group structures and transactions. They assess treaty entitlement, analyse permanent establishment exposure, apply withholding tax rules and relief procedures, perform functional analyses, select transfer pricing methods, run benchmarking studies, draft master file and local file sections, prepare country-by-country reporting, assess BEPS-related risk, build audit defence files, and report tax positions to management. Many leave with a treaty analysis checklist, a functional analysis template, and a documentation checklist ready to use.