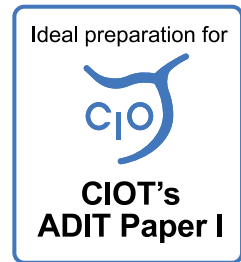


IBFD International Tax Academy presents:



Principles of International Taxation

One week of hard work and in return you'll receive the most comprehensive introduction to the principles of international taxation available

Highlights

- Closely follows the renowned CIOT Advanced Diploma in International Taxation syllabus.
- Includes additional "hot topics" in international taxation such as the permanent establishment concept and transfer pricing of intangibles.
- Principles are explained with reference to real situations for practical understanding and application.
- Opportunity to meet and build a network with other professionals from across the world.
- Qualifies for 33 Continuing Professional Education (CPE) credits.

Amsterdam
14-18 January
2008

www.ibfd.org

IBFD International Tax Academy

Course

Principles of International Taxation

Why participate?

This five-day course covering the essentials of international taxation is suitable for practitioners from both private and public sectors who regularly encounter issues related to cross-border taxation and desire to deepen or develop a comprehensive understanding of the underlying principles.

As well as providing the participants with fundamentals of international taxation, the course includes a substantial section on tax treaty interpretation and application, covering both active and passive income. Participants will be provided with the principles of transfer pricing and an overview of basic tax planning structures, and gain insight into the application of the most common anti-avoidance provisions.

While the course is suitable for practising professionals, it may also be considered a useful starting point in the preparation for the CIOT examination – Advanced Diploma in International Taxation (ADIT Paper I).

Continuing Professional Education

This course qualifies for Continuing Professional Education (CPE) credits with:

- The UK Chartered Institute of Taxation;
- De Nederlandse Federatie van Belastingadviseurs;
- The Institute of Taxation in Ireland;
- The National Association of State Boards of Accountancy; and
- Malaysian professional bodies (for details, contact ITA).

It should be noted that this course may also qualify for CPE credits pursuant to the rules of a number of professional associations other than those listed above. Participants are encouraged to check with their professional associations to determine eligibility in this respect.

The IBFD International Tax Academy is registered with the National Association of State Boards of Accountancy (NASBA), as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN, 37219-2417.

Website: www.nasba.org

Recommended CPE points for this course: 33

(in accordance with the standards of the National Registry of CPE points, CPE credits are granted on a 50-minute hour).

Interactive course

To safeguard the interactive nature of the course, including group discussions and case studies, a maximum of 30 participants will be accepted. Early registration is therefore recommended.

Venue

The course will be held at the IBFD Head Office in Amsterdam, which boasts the latest in teaching facilities. This venue also provides participants with the opportunity to visit and undertake research at the IBFD Library and Information Centre, and offers ample opportunity to network and share information with our resident research staff as well as with other tax professionals.

How to register

Simply fill in your details on the registration form included with this brochure and return it to us by post or fax. Alternatively, visit www.ibfd.org and register online.

Instructors

Paolo Arginelli, advanced LLM in international taxation, is a PhD candidate at the University of Leiden (the Netherlands) and is currently working as a teaching assistant at the International Tax Center in Leiden. Previously, he worked for six years in Italy with Ernst & Young, mainly dealing with corporate restructuring, M&A and tax planning. He regularly lectures and participates in workshops on international tax topics.

S  verine Baranger is a Research Associate in the IBFD European Knowledge Group and an assistant of Prof. Jaap Bellingwout at Baker McKenzie in Amsterdam. She obtained her law degree at the University Paris XII, and an LLM in International Business Law in Leiden, the Netherlands. She is currently finalizing an LLM in International Taxation at the University of Leiden.

Marc van Campen is a partner with Baker & McKenzie Amsterdam, working in the International Tax Department. He specializes in legal and tax aspects of pan-European fund structuring and cross-border private equity investments. His projects include structuring venture capital and private equity funds, advising fund managers on the optimization of their remuneration package and structuring the investments of private equity funds. Mr Van Campen is also engaged in advising and representing the related portfolio companies. He is currently leading the fund structuring practice in the Amsterdam office.

Giammarco Cottani, LLM cum laude in European and International Taxation at the European Tax College, Leuven, Belgium and Tilburg, the Netherlands, is a PhD candidate at LUISS University, Rome and is currently working as a Research Associate in the IBFD Topicals Knowledge Group. Before joining the IBFD, he worked for Cleary Gottlieb Steen & Hamilton and previously with another major Italian law and tax firm. His specialization was Italian and International taxation of corporate groups, M&A and stock offering plans. He obtained a university degree in Law from LUISS University, Rome.

Marcello Distaso is a Partner with Baker & McKenzie Amsterdam, working in the International Tax Department. His main fields of expertise include international tax planning (related mainly to the structuring of venture capital and private equity deals), joint ventures and M&A transactions with particular focus on Italian clients and Central and Eastern European countries. He is a regular speaker at seminars and workshops on the above-mentioned topics.

Carlos Guti  rrez is a Research Associate in the IBFD Latin American Knowledge Group in Amsterdam. He has a law degree from the Universidad de Chile and an LLM from Queen Mary College, University of London. He previously worked for the Chilean tax administration, mainly dealing with international taxation matters.

Bart Kusters is Manager of the IBFD Topicals Knowledge Group and was the Head of the IBFD Asia-Pacific Research Team until August 2005. Before joining the IBFD, he was a senior staff member at the Dutch Ministry of Finance and he was responsible for tax treaty negotiation and application. Furthermore, he is a permanent contributor on international and European tax matters for a leading weekly tax magazine in the Netherlands.

Jan Martens, MSc Economics from the London School of Economics, is a Transfer Pricing Partner with Fidal Direction Internationale in Paris. Prior to joining Fidal, he worked in KPMG's transfer pricing departments in London, Washington DC and Sydney. He has extensive experience in transfer pricing matters, including planning, documentation, tax audit defence and APAs. Mr Martens also assists at OECD consultation rounds with respect to transfer pricing (e.g. Parts I to IV relating to attribution of profits to PEs) and has a second specialization in business valuations.

Instructors

Dan McSwiney is an economist in KPMG's Irish Tax practice with experience both in the US and in KPMG's London transfer pricing group. Before joining KPMG, he was a financial analyst with Wholefoods Market and an economist with the Department of Enterprise & Employment in Ireland. Mr McSwiney is an expert in the valuation of intellectual property and has been involved in numerous projects relating to the cost sharing of intangibles. He specializes in the transfer pricing of brands and trademarks and is currently involved in negotiating a unilateral APA with the US Internal Revenue Service for a major drinks company. In addition, he has worked on establishing the arm's length royalty rates for the right to produce and sell beer for one of the largest beer producers in the world; designed a global transfer pricing system for one of the largest alcoholic drinks makers in the world; valued brands in the pharmaceutical, food, drinks, media, telecommunications and shipping industries; and been involved on 482-7 cost sharing regulations projects involving complex buy-in computations.

Programme

The programme fee includes lunch, coffee, tea and light refreshments during breaks.

Day 1

Basic Principles of International Tax Law

08.30-09.00 **Registration**

09.00-09.15 **Welcome and IBFD Overview**

09.15-10.40 **Introduction**

- Exercising the tax jurisdiction
 - worldwide taxation (residence, domicile, citizenship)
 - limited taxation (source, strict territoriality)
- Issues arising from change of residence
 - exit taxes
 - trailing taxes
 - tax treaty application
- Characterization of entities (transparent or opaque for tax purposes)
- Juridical economic double taxation
- Role of comprehensive tax treaties
 - international legal order
 - historical background
- Relationship between tax treaties and domestic law (treaty override)
- Relationship between tax treaties and EC law
- The format and structure of a tax treaty (OECD, UN and US Model Conventions)
- Scopes of tax treaties
 - taxes
 - persons
 - territories covered
- Types of allocation rules in treaties

10.40-11.00 *Break – refreshments*

11.00-12.45 **Tax Treaty Interpretation**

- The general approach to interpretation
- The Vienna Convention on the Law of Treaties
- The use of external aids for interpretation (the status and the use of the OECD Commentary)
- The application of Art. 3(2) of the OECD Model Tax Convention
- Resolving interpretation issues by competent authority proceedings – Art. 25(3) of the OECD Model Tax Convention

12.45-14.00 *Lunch*

Day 1 (continued)

14.00-15.30 **Residence**

- The concept of residence
 - individuals
 - corporations
 - tax-exempt entities
- Treaty tiebreaker rules
- Dual residence issues
- US savings clause

15.30-15.50 *Break – refreshments*

15.50-17.00 **Case studies**

Suggested resources for this course:

IBFD International Tax Glossary

- More than 2,000 tax terms, clearly and concisely defined in English.
- Alphabetical listing of some 400 English terms together with their French, German, Spanish and Dutch equivalents.
- Cross-referenced listing of terms indicating similar, related and contrasting terms.

Format: A5 hardback book
Published: August 2005 (5th edition)
Pages: 513
Price: € 60 (€ 48 for course participants)

European Tax Handbook, 2007

The most complete survey of tax systems available, providing information on 44 countries and jurisdictions in Europe, plus Canada and the United States. Covers both taxation of companies and of individuals.

Format: A4 book; 844 pages
Published: July 2007
Language: English
Further information: www.ibfd.org

Single copy price: € 225 / \$ 290
Annual subscription: € 175 / \$ 225

Programme

The programme fee includes lunch, coffee, tea and light refreshments during breaks.

Day 2

Double Taxation Convention Focusing on the Current Version of the OECD Model Tax Convention

- 09.00-10.40 **Passive Income**
- Income from immovable property
 - Dividends, interest, royalties
 - Imputation and classical systems
 - Inter-corporate dividends, participation exemption
 - Beneficial ownership
 - Capital gains
 - Art. 21 OECD Model Tax Convention
- 10.40-11.00 *Break – refreshments*
- 11.00-12.45 **Passive Income (continued)**
- 12.45-14.00 *Lunch*
- 14.00-15.00 **Permanent Establishment Concept**
- Basic rule PE concept in OECD Model Tax Convention
 - Auxiliary and preparatory activities
 - Construction site PEs
 - Services
 - E-commerce
 - Agency PE
 - PE concept in the UN Model
 - Case law examples
- 15.00-15.20 *Break – refreshments*
- 15.20-17.00 **Permanent Establishment Concept (continued)**

Day 3

Double Taxation Convention Focusing on the Current Version of the OECD Model Tax Convention

- 09.00-10.40 **Employment Income**
- Taxation of dependent personal services
 - General rules (183-day rule)
 - Hiring-out of labour
 - Frontier workers
 - Taxation of special payments and pensions
 - periodic and lump-sum payments
 - government services
 - students, trainees, professors, directors, artistes and sportsmen
 - Implications for the employing company
- 10.40-11.00 *Break – refreshments*
- 11.00-11.45 **Employment Income (continued)**
- 11.45-12.45 **Double Tax Relief Methods**
- Credit
 - Exemption
 - Deduction
 - Capital import neutrality and capital export neutrality
 - Losses and double tax relief
 - Limitations on relief
 - Conditions for relief
- 12.45-14.00 *Lunch*
- 14.00-15.40 **Profits of an Enterprise**
- Art. 7 OECD Model Tax Convention
 - Allocation of assets and profits
 - Relevance of functions performed and risks undertaken
 - Financing a PE
 - Treatment of losses
 - Head office-PE transactions
 - Profits allocation to agency PE
 - Force of attraction and UN Model
 - Art. 8 OECD Model Tax Convention
- 15.40-16.00 *Break – refreshments*
- 16.00-17.00 **Case Studies**

Programme

The programme fee includes lunch, coffee, tea and light refreshments during breaks.

Day 4

Transfer Pricing and Thin Capitalization Rules

- 09.00-10.40 **Introduction of Transfer Pricing**
- OECD Transfer Pricing Guidelines for Multinational Enterprises
 - Arm's length principle
 - Art. 9 OECD Model Tax Convention
 - Transfer pricing methods
 - Advanced pricing agreements
 - Documentation
 - Latest developments
- 10.40-11.00 *Break – refreshments*
- 11.00-12.45 **Intra-Group Services and Cost Sharing and Valuation of Intangibles**
- Introduction
 - Types of intra-group services or common activities
 - Common structures for service provision
 - Service regulations OECD and US
 - Transfer pricing methods
 - Service charge computation
 - Documentation
 - Cost sharing arrangements
 - Valuation of intangibles
- 12.45-14.00 *Lunch*
- 14.00-15.30 **Intra-Group Services and Cost Sharing and Valuation of Intangibles (continued)**
- 15.30-15.50 *Break – refreshments*
- 15.50-17.00 **Thin Capitalization Rules**
- Overview of thin capitalization rules
 - The arm's length principle and thin capitalization rules

Day 5

Double Tax Treaties and International Tax Avoidance¹

- 09.00-10.40 **Non-discrimination and triangular cases**
- Art. 24 OECD Model Tax Convention
 - Triangular cases involving PE and dual resident companies
- 10.40-11.00 *Break – refreshments*
- 11.00-12.45 **Basic Tax Planning Schemes**
- Treaty shopping
 - Base evasion
 - Use of tax havens
 - Double DIPS
- 12.45-14.00 *Lunch*
- 14.00-15.20 **Basic Tax Planning Schemes (continued)**
- 15.20-15.40 *Break – refreshments*
- 15.40-17.00 **Anti-Avoidance Rules**
- GAAR
 - Controlled foreign companies
 - Anti-tax havens provisions
 - Beneficial ownership
 - LOB

1. Excluding:
- Money-laundering legislation and international tax avoidance (ADIT Paper I, Module IV, Part C);
 - Cooperation between revenue authorities (ADIT Paper I, Module IV, Part D);
 - Miscellaneous topics (ADIT Paper I, Module V).

Registration Information

About IBFD

Since its foundation in 1938, the International Bureau of Fiscal Documentation has developed into one of the most respected organizations studying and documenting international taxation systems and investment legislation. IBFD clients include Ministries of Finance, international corporations, legal and accountancy practices, banks, educational institutions and others who look to IBFD as a first-class source of information. As an independent, not-for-profit research foundation, IBFD always offers objective and unbiased information. A multilingual staff of approximately 50 tax experts from around 30 countries are based at IBFD's offices in Amsterdam, Kuala Lumpur and Washington DC. In addition, research is carried out internationally, with a network of tax specialists relaying information from all over the world.

IBFD International Tax Academy

Founded in 1989, the International Tax Academy (ITA) offers a wide range of courses on international taxation and organizes conferences on special topics. ITA is recognized worldwide as a reputable learning centre in the field of international taxation, drawing on the expertise of internationally renowned specialists and IBFD's multinational research staff to provide a unique environment for the study of international tax law.

The open courses held by ITA are interactive and suitable for participants from all over the world. ITA also offers tailored in-house courses for corporate clients, tax administrations and other organizations and institutions. If you would like to discuss any aspect of our in-house courses, please contact Arcotia Hatsidimitris, Head of ITA, either at +31-20-554 0180 or e-mail A.Hatsidimitris@ibfd.org.

IBFD Library and Information Centre

ITA course participants are free to use the IBFD Library and Information Centre whilst they are in Amsterdam. The library houses the largest collection of titles (both print and electronic) on international and comparative taxation anywhere in the world. During their stay the library is happy to provide participants with a workstation, computer and librarian services free of charge.

Registration details

Venue

IBFD Head Office
H.J.E. Wenckebachweg 210
1096 AS Amsterdam
The Netherlands

Member discount

IBFD members qualify for a 20% discount on the fees of all open courses held by the IBFD International Tax Academy. Companies with several offices, please note that – as with all membership offers – only staff based at the office that actually holds the membership, i.e. the address publications and correspondence are sent to, qualify for the 20% discount.

Accommodation

Participants are responsible for making their own arrangements. Details of suitable hotels will be sent to you upon registration.

Bank details

IBFD International Tax Academy
ING Bank N.V.
Amstelvein 1
1096 HA AMSTERDAM
The Netherlands
Account No. 06 50 16 65 82
Swift Code: INGBNL2A

IBFD International Tax Academy

P.O. Box 20237
1000 HE Amsterdam
The Netherlands
Tel.: +31-20-554 0160
Fax: +31-20-620 9397
E-mail: itacourses@ibfd.org
Website: www.ibfd.org

Registration Form

(please use block letters)

I would like to register for the course:

Principles of International Taxation

Date: 14-18 January 2008 Code: OC08PIT1 Normal fee: € 2,290 / \$ 2,977* Members' fee: € 1,832 / \$ 2,382*

* Clients in the Americas will be invoiced in US dollars.

Mr Mrs _____
(as it is to appear on your name badge)

First name _____
(as it is to appear on your name badge)

I have full IBFD membership (20% discount)

My membership number is _____

Organization _____

Job title _____

Address _____

City and postal code _____

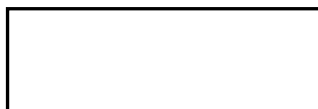
Country _____

Telephone _____ Fax _____

E-mail _____

VAT No. _____

Signature _____ Date _____



(Please note that only signed forms can be processed)

Contact person responsible for training within your organization:

Name _____

Function _____

Telephone _____

E-mail _____

Method of payment

VISA Eurocard/MasterCard American Express

Card No. _____

Expiry date _____ Card validation code _____
(last three digits on the paper strip on the back of your card)

Cardholder name _____

Cardholder address _____

Bank transfer upon receipt of invoice

If the invoice address differs from the above, please indicate:

Organization _____

Attention to _____

Address _____

City and postal code _____

Country _____

Cancellation and other registration conditions

You may be prevented from attending a course due to unforeseen circumstances. If you notify us in writing of your cancellation at least 14 days prior to the event, no cancellation fee will be charged, except for an administration fee to cover the cost of processing the cancellation. If notification is received within 7 to 14 days before the event, a cancellation fee of 50% of the course fee will be charged. We regret that no refunds can be made if notice of cancellation is received less than 7 days before the event. An alternative participant may be substituted at any time without charge provided that the IBFD International Tax Academy is informed in advance of the event. The IBFD International Tax Academy reserves the right to cancel an event if there is an insufficient number of registrations, in which case our liability shall be restricted to a refund of any course fees paid to us. Cancellation notices will be sent at least 14 days in advance of the event. The IBFD International Tax Academy also reserves the right to alter published programmes and speakers without notice.

On receipt of your registration

You will receive a confirmation letter and an invoice. Whenever possible we will use e-mail for correspondence in order to communicate effectively and quickly. Please contact us if you have not received the confirmation letter within 10 days of sending your registration form.

Please visit our website (www.ibfd.org) for full details of our booking information. For more detailed information about our courses or to register you can also call us at +31-20-554 0100, e-mail itacourses@ibfd.org or visit our website at www.ibfd.org.



Please return the completed form by regular mail or fax to:
IBFD International Tax Academy
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Website: www.ibfd.org
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