

CERTIFICATE PROGRAMME

Advanced Professional Certificate in International Taxation

Programme start date

1 April 2023

The programme is designed to be followed online over a 6-month period and consists of a selection of specifically designed IBFD online courses and webinars addressing corporate international taxation. You will be tested throughout the programme and encouraged to engage in active learning through quizzes, assignments, recommended readings and a final assessment.

Once the programme is completed, you will receive a professional certificate of acknowledgement from IBFD, a reputable international organization in the international tax community, to acknowledge that you have successfully completed a rigorous learning regime in corporate international taxation.

Level

Intermediate

Field of study

Taxes

Completion requirements

To benefit from the learning experience for this training and obtain the certificate, completing all mandatory components is necessary. Upon access to the learning platform, the syllabus will indicate the exact completion requirements. Please also consult the [FAQ](#) for more information.

Certificate Programme Phases

PHASE 1 | ONLINE COURSES | APRIL-MAY

Online Course

Cross-Border Corporate Tax Structuring

- › Introduction to cross-border corporate tax structuring
- › Tax structuring of holding and financing activities
- › Tax structuring of manufacturing and distribution activities
- › Tax planning of intangible property

Online Course

Tax Treaty Aspects of Corporate International Tax Structuring

- › Applying tax treaties to cross-border business activities
- › The role of tax treaties in international tax structuring
- › Eligibility to treaty benefits
- › Interpretation and dispute resolution

Online Course

Transfer Pricing Aspects of Corporate International Tax Structuring

- › The role of transfer pricing in international tax planning
- › Transfer pricing methodology in the OECD Transfer Pricing Guidelines
- › Applying the arm's length principle to intragroup transactions
- › Transfer pricing dispute and avoidance and resolution

PHASE 2 | WEBINARS AND ASSIGNMENT | JUNE-JULY

(Webinar titles are subject to change to reflect current international tax developments)

Webinar

Corporate Taxation

- › Permanent establishment (PE) risks in international tax planning and structuring in the post-BEPS era
- › The role and future of holding, finance and IP companies in international tax planning
- › Substance requirements in post-BEPS international tax planning
- › Taxation of capital gains and offshore indirect transfers
- › OECD Pillar Two: Focus on the GloBE rules

Webinar

Tax Treaties

- › Practical tax treaty application post-BEPS
- › Understanding the MLI and treaty aspects of Pillar One and Pillar Two
- › Ensuring beneficial ownership status
- › BEPS tax treaty anti-abuse rules and corporate tax structuring
- › BEPS 14 Action Plan – Effective dispute resolution under tax treaties

Webinar

Transfer Pricing

- › OECD Transfer Pricing Guidelines and areas of controversy
- › Transfer pricing and substance redefined
- › Transfer pricing, R&D and intangibles under attack
- › 2020 update to Transfer Pricing Guidelines on Financial Transactions
- › The OECD Pillar One: Latest developments and what lies ahead – current issues

PHASE 3 | WEBINARS, LIVE WORKSHOP AND FINAL ASSESSMENT | AUGUST-SEPTEMBER

Webinar Controversy Management

- > Cross-border tax disputes and recent cases
- > Transfer pricing disputes and recent cases
- > Cross-border disputes and dispute resolution under OECD Pillar One and Pillar Two
- > Controversy management and transparency initiatives

Live Workshop Live online workshop

- > Practical, complex, case study – group work

Online Course Developers

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