

COURSE INFORMATION

Cross-Border Corporate Tax Structuring

Level

Intermediate

Completion requirements

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

Course Developer

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Course Programme

Modules

Topics Covered

Introduction to cross-border corporate tax structuring

- > Corporate tax planning – avoidance of double taxation and mitigation of single taxation
- > Tax planning, tax avoidance and tax evasion – what are the boundaries?
- > Impact of OECD Pillar 1 and Pillar 2 developments on corporate tax planning

Tax structuring of holding and financing activities

- > Structuring of holding and financing activities – tax and non-tax reasons
- > Structuring of holding activities and key considerations
- > Structuring of financing activities and key considerations

Tax structuring of manufacturing and distribution activities

- > Understanding business models, global supply chains and value chains
- > Tax effective value chain model for multinational enterprises – some key features
- > Conversion of global business models – key tax considerations

Tax planning of intangible property

- > Importance of intangibles in corporate tax planning: IP development vs. IP exploitation
- > IP development models: key features and tax considerations
- > IP exploitation models: key features and tax considerations

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