

COURSE PROGRAMME

Fundamentals of US Corporate Taxation

Course Programme

Lessons**Topics Covered****Module 1****Taxation of US
multinationals with
foreign operations
(US outbound)**

- > Introduction
- > Anti-deferral regimes
- > Transition tax for deferred offshore income of controlled foreign companies (CFCs) as the United States adopts the participation exemption
- > Participation exemption resulting from the 100% deduction for foreign-source dividends
- > Foreign-derived intangible income (FDII)
- > Passive foreign investment companies (PFICs)

Module 2**Taxation of foreign
multinationals with US
operations (US inbound)**

- > Introduction
- > Business income
- > Investment income
- > US sourcing rules
- > Case study

Module 3**Other inbound and
outbound rules as
adopted by the Tax Cuts
and Jobs Act (TCJA)**

- > Introduction
- > Base erosion and anti-abuse tax (BEAT)
- > Interest deduction limitation
- > Anti-abuse rules for hybrid entities and hybrid transactions
- > Case study

Module 4**Double taxation relief**

- > Introduction
- > Foreign tax credit (FTC)
- > Foreign tax deduction
- > Case study

Module 5

**New taxes under the
Inflation Reduction Act
of 2022**

- > Introduction
- > New corporate alternative minimum tax (CAMT)
- > New excise tax imposed on stock buy backs
- > Case study

Module 6

US Tax Treaties

- > Introduction
- > US income tax treaty network (including pending treaties)
- > Model treaties
- > Essential provisions
- > Case study

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Level

Introductory

Completion requirements

To benefit from the learning experience for 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.

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