

CERTIFICATE PROGRAMME

Advanced Professional Certificate in International Taxation

Certificate Programme Phases

(programme is subject to change)

PHASE 1 | ONLINE COURSES | APRIL - MAY 2026

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 2026*(Webinars are subject to change)***Webinars on
Corporate Taxation**

- Permanent Establishment (PE) risks and opportunities in international tax structuring in the post-BEPS era
- Post-BEPS holding, finance and IP Companies in international tax structuring
- Substance requirements in post-BEPS international tax planning
- Taxation of indirect asset transfers
- Pillar Two in action: Practical insights and compliance challenges

**Webinars on
Tax Treaties**

- Post-BEPS practical tax treaty application
- MLI and its practical perspectives
- Beneficial ownership and related controversies
- Treaty anti-abuse rules and corporate tax structuring
- Effective international tax dispute resolution

**Webinars on
Transfer Pricing**

- OECD Transfer Pricing Guidelines and areas of controversy
- Recent developments in transfer pricing
- Trends in transfer pricing of R&D and IP activities
- How to price intragroup financial transactions
- Get ready for Amount B: Key strategies for businesses

PHASE 3 | WEBINARS, LIVE WORKSHOP AND FINAL ASSESSMENT | AUGUST - SEPTEMBER 2026*(Webinars are subject to change)***Webinars on
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 online Workshop

- Practical, complex, case study – group work

Programme start date

1 April 2026

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 live sessions, 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.

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.

Authors and Contributors

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Programme Calendar

PHASE 1

April - May 2026

Online Courses		1. Cross-border corporate tax structuring	2. Tax treaty aspects of corporate international tax structuring	3. Transfer pricing aspects of corporate international tax structuring
Live online participant meet-up session	16 April (15:00 Amsterdam local time)	Opportunity for APCIT participants to get to know each other and network <i>(attendance is optional)</i>		

PHASE 2

June -
July 2026

Where a webinar is not yet recorded, the live broadcast date is shown and participants will be able to attend live, if they choose. Webinars are subject to change.

Webinars (pre-recorded)	Corporate Taxation	1. Permanent Establishment risks and opportunities in international tax structuring in the post-BEPS era	2. Post-BEPS holding, finance and IP Companies in international tax structuring	3. Substance requirements in post-BEPS international tax planning
		4. Taxation of indirect asset transfers	5. Pillar Two in action: Practical insights and compliance challenges	
		6. Post-BEPS practical tax treaty application	7. MLI and its practical perspectives	8. Beneficial ownership and related controversies
		9. Treaty anti-abuse rules and corporate tax structuring	10. Effective international tax dispute resolution	
		11. OECD Transfer Pricing Guidelines and areas of controversy	12. Recent developments in transfer pricing	13. Trends in transfer pricing of R&D and IP activities
	Transfer Pricing	14. How to price intragroup financial transactions	15. Get ready for Amount B: Key strategies for businesses	
	Case study assignment	17 - 27 July	Case study assignment (Mandatory individual online assignment)	
		11 August (15:00 Amsterdam local time)	Assignment feedback (Live online session, optional attendance. The recorded session will also be available to watch)	

PHASE 3

August - September 2026

Webinars	Controversy Management	<ul style="list-style-type: none"> ➢ Cross-border tax disputes and recent cases ➢ Transfer pricing disputes and recent cases ➢ Cross border disputes and dispute resolution under OECD Pillar 1 and Pillar 2 ➢ Controversy Management and Transparency Initiatives
Live Online Workshop	1 September (09:00 or 16:00 Amsterdam local time)	<i>Practical, complex, case study – group work (Live online session, optional attendance. The recorded session will also be available to watch)</i>
Final assessment	8 - 15 September (incl.)	<i>Final assessment (multiple-choice questions)</i>
Resit (if applicable)	18 - 25 September (incl.)	Resit – Final assessment
Certificate	Until 30 September (incl.)	Successful participants can download their personalized APCIT Certificate from the learning platform

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