Summary
This three-day intermediate-level course focuses on a number of common international tax planning techniques for treasury operations, supply chain and intangibles. It covers, through a combination of formal presentations and complex case studies, the international tax planning opportunities presented by domestic and international tax law and the associated risks in the current environment, including the increasing range of applicable anti-avoidance rules.

Overview and Learning Objectives
This course is designed to provide participants with an in-depth understanding of how domestic and international tax law are used in practice for international tax planning purposes. The topics covered include the selection of corporate forms such as holding companies, dual-resident companies, branches and hybrid entities to achieve the desired international tax outcomes. The course also covers international tax structuring involving debt financing, intangible property and manufacturing and selling activities, and the relevant international tax rules that may help or hinder these structures, including the application of anti-avoidance rules.

Prior to the course, participants will be given access to an online platform which provides them with additional pre-reading material and supplementary material (e.g. legal documentation, case law and related articles/literature). During the course, participants will be provided with a course binder containing documents relevant to the course.

Who Should Attend?
The course is suitable for practitioners in tax advisory firms, tax specialists in commerce and industry, and government officials.

Course Level and Prerequisites
This is an intermediate-level course. The course material will be in English but the course will be conducted in a mixture of English and Chinese. To enhance understanding of the issues discussed, there will be opportunities to interact in Chinese. Participants taking this course will be expected to have a good understanding of at least one national tax system and the fundamentals of double tax treaties.
Day 1

08.30 - 09.00 Registration

09.00 - 10.30 Current Trends in International Tax Planning
- Fundamentals of international tax planning
- Tax planning, tax avoidance and tax evasion
- International tax planning tools
- OECD report on Base Erosion and Profit Shifting
- G20 and European Union initiatives
- What is aggressive tax planning?
- Relevance for Chinese enterprises

10.30 - 11.00 Break – Refreshments

11.00 - 12.30 Tax Planning for Holding Activities
- Goals and objectives of holding companies
- Relevance for Chinese enterprises
- Selection of a holding company location
- Taxation of interest, royalties, dividends and capital gains
- Overview of holding companies locations
- Relevance of tax treaties and other international tax rules
- Controlled foreign company rules

12.30 - 13.30 Lunch

13.30 - 15.00 Tax Structuring through Debt Financing
- Debt vs equity
- Use of finance companies
- Back-to-back arrangements
- Financing mergers and acquisitions
- Relevant international tax law
- Thin capitalization rules and anti-tax haven rules

15.00 - 15.30 Break – Refreshments

15.30 - 17.00 Case Study
Day 2

09.00 - 10.30  Tax Planning for Manufacturing and Selling Activities
- Common types of business restructuring
  - manufacturing activities
  - distribution activities
  - shared services
- The application of the arm's length principle
  - contractual allocation of risks
  - transfers of assets
  - remuneration of restructured entities
  - practical examples
- Tax treaty consideration – is there a permanent establishment?
- Chinese perspective of the permanent establishment issue
- Post-restructuring profit attribution issues

10.30 - 11.00  Break – Refreshments

11.00 - 11.45  Tax Planning for Manufacturing and Selling Activities (continued)

11.45 - 12.30  Tax Planning for R&D Activities and Intangible Property
- Main tax issues
- Choice of location in the creation and exploitation of intellectual property
- The migration of intellectual property
- Conventional royalty model
- Back-to-back licensing model
- Principal entity structures
- Cost contribution arrangements
- Transfer pricing aspects of intangibles tax planning

12.30 - 13.30  Lunch

13.30 - 15.00  Tax Planning for R&D Activities and Intangible Property (continued)

15.00 - 15.30  Break – Refreshments

15.30 - 17.00  Case Study
Day 3

09.00 - 10.30  Tax Structuring through Entity Mismatches

- Entity mismatches in tax planning – companies, branches and hybrids
- Tax structures involving entity mismatches
- Practical examples and cases
- What are hybrid entities?
- Possible ways to deal with potential conflicts
- Examples of treaty responses to hybrid mismatches
- Other responses to hybrid entity mismatches

10.30 - 11.00  Break – Refreshments

11.00 - 11.45  Tax Structuring through Entity Mismatches (continued)

11.45 - 12.30  Hybrid and Derivative Instruments in Tax Planning

- What are hybrid instruments?
- Taxation of hybrid instruments
- Hybrid instruments as a tax planning tool – some examples
- Responses to hybrid instrument mismatches
- What are derivative instruments?
- Taxation of derivative instruments
- Use of derivatives in tax planning
- Responses to the use of derivatives in tax planning

12.30 - 13.30  Lunch

13.30 - 15.00  Hybrid and Derivative Instruments in Tax Planning (continued)

15.00 - 15.30  Break – Refreshments

15.30 - 17.00  Case Study