Corporate Tax Strategy & Group Structuring Training Course

Professional Development Training Course Outline

Category	Taxation and Revenue	**Duration**	5 Days
Base Fee	$1,500 USD	**Delivery Mode**	Online / On-site Hybrid

Course Introduction

Corporate Tax Strategy & Group Structuring Training Course provides a comprehensive understanding of how corporations—both multinational and domestic—can design and implement effective tax strategies that align with global regulatory standards and best practices. It explores how strategic tax planning can enhance group efficiency, reduce exposure to tax risks, and support long-term business sustainability. Participants will learn how to assess and structure corporate groups, mergers, acquisitions, and reorganizations from a tax and compliance perspective, ensuring adherence to international tax frameworks and transfer pricing regulations.

The course emphasizes the importance of tax governance, internal control systems, and proactive risk management in maintaining transparency and compliance across jurisdictions. It also covers the strategic use of holding companies, financing arrangements, and intellectual property ownership structures to optimize global tax positions and cash flow management. By the end of the program, participants will be able to develop and implement robust, compliant, and tax-efficient corporate structures that enhance competitiveness and financial performance in an increasingly complex international tax environment.

Programme Curriculum

Corporate Tax Strategy & Group Structuring Training Course

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Course Objectives:

By the end of this course, participants will be able to:

1. Understand the core principles of corporate tax planning and structuring.
2. Design tax-efficient group structures for domestic and international operations.
3. Apply tax considerations to mergers, acquisitions, and business reorganizations.
4. Evaluate holding company jurisdictions and their tax implications.
5. Implement strategies to minimize double taxation and optimize global cash flows.
6. Integrate transfer pricing principles within corporate tax strategy.
7. Ensure compliance with OECD BEPS and global transparency requirements.
8. Develop governance frameworks for tax risk management.
9. Assess the impact of digital transformation on corporate tax structures.
10. Apply effective strategies for intercompany financing and profit repatriation.
11. Align tax planning with corporate social responsibility (CSR) and ESG initiatives.
12. Manage tax audits, disputes, and disclosure requirements.
13. Formulate a long-term tax roadmap for sustainable growth.

Target Audience:

- Chief Financial Officers (CFOs)
- Corporate Tax Directors and Managers
- Finance and Accounting Professionals
- Legal and Compliance Officers
- Business Restructuring Consultants
- Group Treasury and Finance Executives
- Auditors and Risk Advisors
- Tax Consultants and Advisors

Course Duration: 5 days

Course Modules

Module 1: Foundations of Corporate Tax Strategy

- Overview of corporate tax systems and frameworks
- Strategic importance of tax planning in business growth
- Tax policy, incentives, and compliance environment
- Corporate residency and permanent establishment rules
- Role of tax strategy in financial decision-making
- **Case Study:** Tax-efficient restructuring of a multinational entity

Module 2: Group Structuring Fundamentals

- Types of corporate group structures and their implications
- Domestic vs. international group tax planning
- Consolidated tax returns and group relief mechanisms
- Dividend distribution and repatriation strategies
- Legal and regulatory aspects of group formation
- **Case Study:** Designing an optimal multinational group structure

Module 3: Mergers, Acquisitions & Reorganizations

- Tax implications of mergers, spin-offs, and acquisitions
- Capital gains and loss utilization
- Post-merger integration and goodwill considerations
- Tax-neutral reorganization strategies
- Anti-avoidance and transfer pricing implications
- **Case Study:** Tax structuring of a cross-border merger

Module 4: Holding Company and Financing Structures

- Selection of holding company jurisdictions
- Substance requirements and anti-treaty abuse rules
- Intercompany loans, royalties, and interest deductions
- Thin capitalization and hybrid mismatch rules
- Managing withholding tax and treaty benefits
- **Case Study:** Evaluating holding structures in Europe and Asia

Module 5: Transfer Pricing and Intragroup Transactions

- Transfer pricing documentation and compliance
- Intragroup service and management fee arrangements
- Intangible assets and cost-sharing agreements
- OECD BEPS Actions 8–10 compliance requirements
- Managing transfer pricing audits and adjustments
- **Case Study:** Designing arm's-length transfer pricing policies

Module 6: Cross-Border Tax Planning and Treaty Use

- Double taxation treaties and their application
- Tax residency certificates and beneficial ownership
- Treaty shopping and limitation of benefits (LOB) clauses
- Global minimum tax (Pillar Two) implications
- Cross-border financing and investment structures
- **Case Study:** Using tax treaties to optimize global tax positions

Module 7: Tax Risk Management and Governance

- Building a robust tax governance framework
- Managing reputational and compliance risks
- Integrating ESG and tax transparency principles
- Audit readiness and dispute resolution strategies
- Internal controls and documentation standards
- **Case Study:** Tax governance and compliance for listed companies

Module 8: Emerging Trends and Future of Corporate Taxation

- Impact of digital economy and global tax reform (Pillar One & Two)
- AI and technology in tax planning and compliance
- Sustainability-linked tax incentives and ESG reporting
- Global data transparency and digital filing systems
- Future-proofing corporate tax strategies
- **Case Study:** Adapting corporate tax strategy to global reforms

Training Methodology:

- **Instructor-Led Sessions:** Conducted by international tax experts and practitioners.
- **Interactive Discussions:** Promotes collaborative learning and professional exchange.
- **Case Studies & Practical Scenarios:** Emphasizes real-world application of complex tax principles.
- **Workshops & Group Exercises:** Enhance analytical and decision-making skills.
- **Simulation Projects:** Engage participants in tax strategy formulation and review.
- **Knowledge Assessments:** Evaluate understanding and practical skill application.

Register as a group from 3 participants for a Discount

Send us an email: info@fineskilltrainingcenter.com or call *+254769199797*

Certification

Upon successful completion of this training, participants will be issued with a globally- recognized certificate.

Tailor-Made Course

We also offer tailor-made courses based on your needs.

Key Notes

a. The participant must be conversant with English.

b. Upon completion of training the participant will be issued with an Authorized Training Certificate

c. Course duration is flexible and the contents can be modified to fit any number of days.

d. The course fee includes facilitation training materials, 2 coffee breaks, buffet lunch and A Certificate upon successful completion of Training.

e. One-year post-training support Consultation and Coaching provided after the course.

f. Payment should be done at least a week before commence of the training, to FINESKILL TRAINING CENTER account, as indicated in the invoice so as to enable us prepare better for you.

Upcoming Scheduled Sessions

Start Date	End Date	Location	Price
07 Sep 2026	11 Sep 2026	Physical	$1,500

Start Date	End Date	Location	Price
14 Sep 2026	18 Sep 2026	Physical	$1,500
21 Sep 2026	25 Sep 2026	Physical	$1,500
28 Sep 2026	02 Oct 2026	Physical	$1,500
05 Oct 2026	09 Oct 2026	Physical	$1,500
12 Oct 2026	16 Oct 2026	Physical	$1,500
19 Oct 2026	23 Oct 2026	Physical	$1,500
26 Oct 2026	30 Oct 2026	Physical	$1,500

Ready to enroll or request a customized program? Book online or contact us:

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