Cross-Border Tax Planning & Treaty Use 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

Cross-Border Tax Planning & Treaty Use Training Course offers a comprehensive exploration of international tax principles, focusing on how multinational enterprises (MNEs) and global investors can optimize tax efficiency while maintaining full compliance. Participants will gain a deep understanding of bilateral and multilateral tax treaties, residency rules, and permanent establishment (PE) concepts that determine cross-border tax liabilities. The program provides practical guidance on structuring international operations, mitigating double taxation, and leveraging treaties for tax-efficient business models.

In addition, the course addresses contemporary challenges in treaty interpretation, anti-abuse measures, and the impact of global tax reforms such as BEPS, Pillar One, and Pillar Two. Participants will analyze case studies of real-world treaty applications and cross-border structuring scenarios. By the end of the training, professionals will be equipped to apply treaty benefits responsibly, avoid treaty shopping pitfalls, and design effective tax strategies that align with evolving international standards and regulatory expectations.

Programme Curriculum

Cross-Border Tax Planning & Treaty Use Training Course

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Course Objectives

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

1. Understand the fundamental principles of cross-border tax planning.
2. Analyze the structure and application of double taxation agreements (DTAs).
3. Interpret key provisions of OECD and UN model tax treaties.
4. Determine tax residency and permanent establishment status.
5. Identify opportunities for lawful tax optimization using treaties.
6. Evaluate the impact of BEPS and anti-abuse clauses on treaty benefits.
7. Structure cross-border transactions for maximum tax efficiency.
8. Manage withholding tax obligations under treaty provisions.
9. Handle tax audits and disputes involving treaty interpretation.
10. Assess the role of digital economy taxation and global minimum tax.
11. Understand transfer pricing interactions with treaty rules.
12. Apply case law and international precedents in treaty analysis.
13. Formulate compliant strategies for global tax risk management.

Target Audience

- International tax advisors and consultants
- CFOs and finance directors
- Tax managers in multinational corporations
- Legal and compliance officers
- Accountants and auditors handling cross-border clients
- Investment analysts and financial planners
- Government and revenue authority officers
- Policy analysts and regulatory professionals

Course Duration: 5 days

Course Modules

Module 1: Fundamentals of Cross-Border Tax Planning

- Overview of international tax systems and principles
- The importance of tax planning in global business operations
- Key drivers of cross-border taxation: source vs. residence
- Risk management and compliance considerations
- Ethical standards and transparency in tax planning
- Case study: Structuring international subsidiaries efficiently

Module 2: Understanding Double Taxation Agreements (DTAs)

- The purpose and structure of tax treaties
- OECD and UN Model Conventions: similarities and differences

- Methods for eliminating double taxation (credit and exemption)
- Role of Competent Authorities in treaty application
- Treaty shopping and limitation on benefits (LOB) clauses
- Case study: Application of DTA between Kenya and the UK

Module 3: Tax Residency and Permanent Establishment (PE)

- Determining corporate and individual tax residency
- Types of permanent establishments (fixed, dependent agent, etc.)
- Attribution of profits to a PE under Article 7 of OECD Model
- Recent developments in PE threshold interpretations
- Managing PE exposure in digital and service-based businesses
- Case study: PE risk management in multinational service firms

Module 4: Withholding Taxes and Cross-Border Payments

- Overview of withholding taxes on dividends, interest, and royalties
- Treaty-based reductions and exemptions
- Managing compliance and reporting obligations
- Avoiding double taxation through credit mechanisms
- Impact of hybrid mismatches and conduit arrangements
- Case study: Treaty relief on cross-border financing structures

Module 5: BEPS, Anti-Abuse Rules, and Treaty Reforms

- OECD BEPS Action Plan and its relevance to tax treaties
- Principal Purpose Test (PPT) and LOB provisions
- Multilateral Instrument (MLI) and treaty modification process
- Addressing artificial arrangements and treaty abuse
- Implementing substance requirements and beneficial ownership tests
- Case study: MLI implementation in Asia and Europe

Module 6: Strategic Cross-Border Structuring

- Designing holding, financing, and licensing structures
- Location of IP, treasury, and shared service centers
- Managing cross-border mergers and acquisitions
- Evaluating tax-efficient routes for investment
- Integrating treaty planning with transfer pricing strategies
- Case study: Cross-border investment structuring in Africa

Module 7: Dispute Resolution and MAP Procedures

- Managing treaty-related tax disputes
- Mutual Agreement Procedure (MAP) process and best practices
- Arbitration mechanisms under tax treaties
- Interaction between domestic remedies and MAP outcomes
- Avoiding double taxation through proactive dispute management
- Case study: Successful MAP resolution in multinational operations

Module 8: Global Tax Trends and Digital Economy

- Pillar One and Pillar Two global tax reforms
- Digital taxation and nexus rules for online businesses
- Tax challenges for e-commerce and platform economies
- Cross-border data and IP taxation under modern treaties
- Future of tax cooperation and international transparency
- Case study: Impact of global minimum tax on treaty planning

Training Methodology

- Instructor-led interactive presentations
- Real-world treaty application case studies
- Group workshops and simulation exercises
- Hands-on treaty interpretation and planning sessions
- Problem-solving discussions and peer learning
- Knowledge assessments and reflection activities

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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