International Tax Treaties & Double Taxation Agreements (DTAs) 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

The global business landscape is increasingly interconnected, making the understanding of international tax treaties and double taxation agreements (DTAs) crucial for multinational corporations, tax professionals, and policymakers. International Tax Treaties & Double Taxation Agreements (DTAs) Training Course provides comprehensive insights into the frameworks governing cross-border taxation, helping participants navigate complex tax jurisdictions, mitigate double taxation risks, and optimize global tax strategies. Emphasizing practical application, the training integrates real-world examples, case studies, and strategic guidance on treaty interpretation, transfer pricing, and dispute resolution. Participants will gain in-depth knowledge of OECD guidelines, model tax conventions, and emerging trends in international taxation, ensuring compliance and informed decision-making.

In addition to technical proficiency, the course addresses strategic considerations for corporate planning, investment structuring, and regulatory compliance. By exploring the nuances of bilateral and multilateral tax treaties, participants will develop the skills to evaluate treaty benefits, identify treaty abuse, and apply provisions to reduce fiscal exposure. This course also examines recent developments in the digital economy, cross-border income sourcing, and evolving anti-avoidance measures, empowering professionals to adapt to a rapidly changing global tax environment. Through interactive sessions, practical exercises, and case studies, attendees will emerge with actionable insights and enhanced capabilities to optimize international tax outcomes.

Programme Curriculum

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Course Objectives

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

1. Analyze international tax treaties and understand their role in mitigating double taxation.
2. Interpret key provisions of bilateral and multilateral DTAs.
3. Apply OECD model conventions and guidelines for cross-border taxation.
4. Assess treaty benefits and limitations for multinational corporations.
5. Evaluate the impact of tax treaties on transfer pricing strategies.
6. Identify treaty abuse and implement anti-avoidance measures.
7. Navigate tax compliance requirements across multiple jurisdictions.
8. Integrate international tax planning into corporate strategies.
9. Apply dispute resolution mechanisms under DTAs.
10. Examine the taxation of digital economy transactions and e-commerce.
11. Utilize case studies to solve real-world cross-border tax issues.
12. Monitor emerging trends in international tax law and policy.
13. Develop organizational policies for global tax risk management.

Organizational Benefits

- Enhanced cross-border compliance and risk management
- Optimized international tax planning strategies
- Reduction of double taxation and fiscal exposure
- Improved corporate governance and policy implementation
- Greater understanding of treaty benefits and obligations
- Effective dispute resolution and treaty interpretation skills
- Strengthened transfer pricing compliance
- Insights into digital economy taxation challenges
- Better decision-making for investment structuring
- Alignment with OECD guidelines and global best practices

Target Audiences

1. Tax professionals and advisors
2. Corporate finance managers
3. Multinational corporation executives
4. Tax compliance officers
5. Policy makers and government officials
6. Legal advisors specializing in international taxation
7. Investment managers and planners
8. Accountants and auditors

Course Duration: 5 days

Course Modules

Module 1: Introduction to International Tax Treaties

- History and evolution of tax treaties
- Types of international tax agreements
- Key principles and terminologies
- Importance for multinational corporations
- Overview of OECD Model Tax Convention
- Case study: Impact of early treaties on global trade

Module 2: Understanding Double Taxation Agreements (DTAs)

- Definition and objectives of DTAs
- Mechanisms to avoid double taxation
- Interaction with domestic tax laws
- Treaty residency rules
- Permanent establishment concepts
- Case study: Resolving double taxation for cross-border income

Module 3: OECD Guidelines and Model Conventions

- Overview of OECD Model Tax Convention
- Role in harmonizing international taxation
- Transfer pricing provisions
- Anti-abuse rules
- Recent updates and amendments
- Case study: Applying OECD guidelines in a multinational setting

Module 4: Treaty Interpretation and Application

- Methods of treaty interpretation
- Treaty override issues
- Key articles in bilateral treaties
- Limitation on benefits clauses
- Tax credit vs. exemption methods
- Case study: Application of treaty provisions for an international company

Module 5: Transfer Pricing and Cross-Border Transactions

- Arm's length principle
- Methods of transfer pricing determination
- Documentation and compliance
- Relationship with DTAs
- Dispute prevention strategies
- Case study: Transfer pricing adjustments under a DTA

Module 6: Anti-Avoidance Measures and Treaty Abuse

- Common treaty abuse scenarios
- General anti-avoidance rules
- Specific anti-avoidance provisions in DTAs
- Role of competent authorities
- Preventive measures and compliance
- Case study: Identifying treaty shopping schemes

Module 7: Digital Economy and E-Commerce Taxation

- Taxation challenges of digital services
- E-commerce and international tax treaties
- Nexus and source rules
- Digital services taxes
- OECD/G20 BEPS initiatives
- Case study: Digital business taxation in multiple jurisdictions

Module 8: Dispute Resolution under DTAs

- Mutual agreement procedures
- Arbitration mechanisms
- Competent authority functions
- Resolving cross-border tax disputes
- Practical challenges and examples
- Case study: Successful dispute resolution between two countries

Training Methodology

- Interactive lectures with real-world examples
- Case study analysis and practical exercises
- Group discussions and peer learning
- Hands-on exercises in treaty interpretation
- Simulation of cross-border tax planning scenarios
- Expert-led workshops and Q&A sessions

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	Online	$1,100
14 Sep 2026	18 Sep 2026	Online	$1,100
21 Sep 2026	25 Sep 2026	Online	$1,100
28 Sep 2026	02 Oct 2026	Online	$1,100
05 Oct 2026	09 Oct 2026	Online	$1,100
12 Oct 2026	16 Oct 2026	Online	$1,100
19 Oct 2026	23 Oct 2026	Online	$1,100
26 Oct 2026	30 Oct 2026	Online	$1,100

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