Taxation of Multinational Corporations 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

Taxation of Multinational Corporations Training Course provides a comprehensive overview of how multinational enterprises (MNEs) are taxed across jurisdictions, focusing on key principles of international tax law, transfer pricing, and cross-border profit allocation. Participants will gain insights into how global tax systems interact, the challenges of double taxation, and the strategies used by multinational corporations to optimize tax efficiency while maintaining compliance.

The program explores global tax policies, the OECD guidelines, and mechanisms used to prevent base erosion and profit shifting (BEPS). It also highlights how digitalization, global supply chains, and evolving international tax reforms affect the corporate tax landscape. Participants will learn practical approaches to managing tax exposures, interpreting double tax treaties, and ensuring proper documentation for intercompany transactions. The course integrates real-world examples, giving professionals the tools to navigate complex global tax environments and align corporate tax strategies with regulatory compliance.

Programme Curriculum

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Course Objectives

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

1. Understand the key principles governing the taxation of multinational enterprises.
2. Explain the structure and purpose of international tax systems and treaties.
3. Evaluate transfer pricing methods and compliance obligations.
4. Identify and manage risks related to double taxation and tax avoidance.
5. Analyze the impact of global tax reforms, BEPS, and digitalization on MNEs.
6. Apply effective tax planning and risk management strategies.
7. Interpret cross-border withholding taxes and permanent establishment rules.
8. Prepare and review documentation for intercompany transactions.
9. Examine case studies on international tax audits and controversies.
10. Understand tax incentives and anti-avoidance regulations.
11. Strengthen governance frameworks for multinational tax compliance.
12. Assess global tax transparency and reporting requirements.
13. Develop a tax-efficient strategy aligned with business objectives.

Target Audience

This course is ideal for:

1. Chief Financial Officers (CFOs)
2. Tax Directors and Managers
3. Transfer Pricing and Compliance Specialists
4. Financial Analysts and Auditors
5. International Accountants and Consultants
6. Legal and Compliance Officers
7. Revenue Authority Officials
8. Policy Makers and Tax Administrators

Course Duration: 5 days

Course Modules

Module 1: Fundamentals of International Taxation

- Overview of global tax systems and their interaction
- Principles of residence- and source-based taxation
- Determining taxable presence (Permanent Establishment)
- Withholding tax mechanisms and treaty relief
- Global tax coordination and double taxation agreements
- **Case Study:** Application of residence and source rules in a global transaction

Module 2: Transfer Pricing Framework and OECD Guidelines

- Understanding transfer pricing principles
- Arm’s length principle and comparability analysis

- Functional and risk-based allocation of profits
- OECD Transfer Pricing Guidelines overview
- Documentation and local file/master file requirements
- **Case Study:** Intercompany pricing structure audit in a multinational group

Module 3: Double Taxation Treaties and Relief Mechanisms

- Role and structure of tax treaties under OECD and UN models
- Methods of eliminating double taxation
- Permanent establishment rules and profit attribution
- Treaty interpretation and dispute resolution mechanisms
- Treaty abuse and anti-avoidance clauses
- **Case Study:** Cross-border income taxation and treaty benefits application

Module 4: Base Erosion, Profit Shifting (BEPS), and Global Tax Reforms

- Overview of the OECD/G20 BEPS framework
- Key BEPS Action Plans affecting MNEs
- Pillar One and Pillar Two: global minimum tax implications
- Anti-hybrid and controlled foreign company (CFC) rules
- Global tax reform trends and country-level implementation
- **Case Study:** BEPS compliance strategy for a global service provider

Module 5: Digital Economy and Cross-Border Taxation

- Challenges of taxing the digital economy
- Digital services taxes (DSTs) and global responses
- Allocation of taxing rights under new frameworks
- E-commerce and online service taxation
- Emerging trends in global digital tax policy
- **Case Study:** Digital tax implications for a multinational tech company

Module 6: Managing Tax Risks and Corporate Governance

- Identifying and mitigating multinational tax risks
- Designing effective internal tax control systems
- Tax risk appetite and governance structures
- Managing cross-border audits and disputes
- Aligning corporate tax strategy with global compliance obligations
- **Case Study:** Tax governance best practices in a listed multinational corporation

Module 7: Tax Transparency and Reporting Requirements

- Country-by-country (CbC) reporting obligations
- Exchange of information and data sharing agreements
- Tax transparency initiatives (CRS, FATCA, etc.)
- Tax authority cooperation and audit trends
- Ensuring data accuracy and compliance in tax disclosures
- **Case Study:** Implementation of CbC reporting for a multinational enterprise

Module 8: Strategic Tax Planning for Multinationals

- Structuring global operations for tax efficiency
- Use of holding companies, finance centers, and IP structures
- Tax-efficient supply chain management
- Managing repatriation of profits and foreign tax credits
- Balancing compliance and tax optimization
- **Case Study:** Designing a tax-efficient group structure for an international firm

Training Methodology

- Interactive instructor-led presentations
- Group discussions and peer learning sessions
- Real-world case studies and scenario simulations
- Practical exercises in tax documentation and analysis
- Review of current OECD and domestic tax updates
- Q&A sessions, feedback, and best practice sharing

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

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