

**Principles of
US
international
corporate
taxation**

**Small
classes:
tuition by
experts**

**Principles
and practice
of transfer
pricing**

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for ADIT?**



**Working in a
new area of
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tax?**

**Gaps in
your
knowledge?**

**Principles of
International
Taxation**

**In-depth US
international
corporate
taxation**

**Intensive
learning**



Book now for courses on...

International, US tax and transfer pricing

London: March/April 2015

COURSES

At DJH International Tax Ltd. We have been running short, intensive courses in international tax, US corporate tax and transfer pricing since 2011. Each course is 3-4 days in length, making them ideal for those who can spare little time away from the office or who are travelling from outside the UK.

Our tutors, although they teach regularly, are experts in their field, meaning they can bring unique practical experience to the classes.

We keep classes small, so everyone benefits fully from the tutors' attention and can have their questions answered on the spot.

While we focus on providing practical help on real international tax problems, our courses featured here are based around the relevant syllabus for the Advanced Diploma in International Taxation, so are ideal as part of your programme of study for that qualification.

HOW TO BOOK

There are three ways to book:

Go online and complete the relevant booking form. Full listings on [this page](#)

Email:
info@djhinternationaltax.com

Phone Deborah Hicks on:
+44 (0)1962 458058

PRICING

3½ day courses: £1550

4 day courses: £1600

VAT will be added at 20% where applicable.

Prices include tuition, course documentation, lunch and unlimited refreshments throughout. *Principles of International Tax* includes book of same name by Miller & Oats.

COURSE DIARY

Principles and Practice of Transfer Pricing

23-26 March 2015 – agenda page 3

Ken Almand; Stephane Gelin; Dr Emmanuel Llinares; Jennifer Paul; Lee Corrick – *see page 5*

Principles of US International Corporate Taxation

23-26 March 2015 – agenda page 4

Narelle MacKenzie – *see page 6*

Principles of International Taxation

30 March – 2 April 2015 – agenda page 3

Dr Angharad Miller – *see page 6*

In-depth US international corporate taxation

30 March – 2 April 2015 – agenda page 4

Narelle MacKenzie – *see page 6*

COURSE VENUE

The venue for our courses is etc. venues, Dexter House, 2 Royal Mint Court, London EC3N 4QN, a dedicated training venue with excellent facilities.

Located just around the corner from both Tower Hill and Tower Gateway stations, the venue is easily accessible from all parts of London and all major transport links.

TERMS & CONDITIONS

Places may be reserved by email but **cannot be guaranteed until payment has been received.**

Payment in full is required 30 days prior to commencement of the conference or on receipt of an invoice, whichever is later.

Substitution of participants may be made at any time without charge.

Cancellations received in writing more than 30 days prior to the conference will be refunded, less a 20% administration charge.

Cancellations received in writing between 15 and 30 days prior to the conference will be refunded, subject to a 50% administrative charge.

No refund for cancellations received less than 15 days prior to the first day of the conference.

Participants unable to attend may, however, defer their participation until the course is next run.

The course fee is fully refundable only if the event is not held as scheduled. If this should happen, DJH International Tax Ltd. will not be responsible for any additional costs, such as accommodation and travel.

PRINCIPLES and PRACTICE of TRANSFER PRICING

Fundamental sources

The arm's length principle and comparability

- Interpretation of the arm's length principle and current dialogue
- Associated enterprises
- The role of comparables
- Transaction analysis
- Recharacterisation issues

Transfer pricing methods and comparability analyses in practice

Functional analysis

- Goals of functional analysis
- Analysis of functions, assets and risks
- Relating functional analysis to selection of transfer pricing method
- Entity characterisation

Permanent Establishments

Compliance issues

- TP documentation and reporting
- Penalties
- TP risk management

Avoiding Double Taxation/Dispute Resolution

- Internal TP adjustments
- Mutual agreement procedure
- Arbitration
- APAs (unilateral, bilateral, multilateral)

Specific transactions

- Intangible property
- Valuation of intangible assets
- Business restructurings
- Intra-group services
- Financing
- Loan pricing

BEPS and the current work of the OECD

PRINCIPLES of INTERNATIONAL TAXATION

Basic principles of international tax law

- Jurisdiction to tax
- Taxes and tax systems
- State practice in exercising tax jurisdiction
- Limits to tax jurisdiction
- Causes of International Double Taxation
- Methods of relief from International Double Taxation
- Private international law and taxation
- History of international tax law
- State responsibility in international taxation – the development of the concept of harmful tax competition

Double Taxation Conventions focusing on the current version of the OECD Model Tax Convention

- Types of DTCs
- DTCs and domestic law
- The format and structure of a DTC
- The approach to the application of a DTC
- The interpretation of DTCs
- Provisions relating to the scope of a DTC
- Key definitional provisions
- Businesses; individuals; investment income
- Relevance of the "other income" Article
- Limitation of benefit provisions
- Methods of elimination of Double Taxation
- The impact of the non-discrimination Article
- The resolution of disputes under DTCs
- The application of DTCs to electronic commerce

International tax avoidance

- Tax havens
- Domestic law approaches to international tax avoidance
- Money-laundering legislation and international tax avoidance
- Co-operation between revenue authorities: exchange of information; joint investigations; co-operation in enforcement

Transfer pricing and thin capitalisation rules

- Various approaches to the determination of profits of branches and associated enterprises
- Transfer pricing and DTCs
- Advanced pricing agreements
- The OECD Transfer Pricing Guidelines
- State practice with respect to thin capitalization
- Thin capitalisation legislation and DTCs

PRINCIPLES OF US INTERNATIONAL CORPORATE TAX

The structure of the US tax system

- Federal taxation vs. state and local taxation
- The federal tax system: the Internal Revenue Code

US federal income taxation: overview

- Basic rule: taxation of worldwide income of US persons
- Individuals
- Corporations
- Partnerships
- Trusts and estates
- Classification of business entities: the “check the box” regime
- Basic rules regarding taxation of non-US persons
- Source of income: section 861 et seq.

Inbound investment

- Non-US persons engaged in the conduct of a US trade or business
- Non-US persons not engaged in the conduct of a US trade or business
- Foreign Investment in Real Property Tax Act
- Special US tax treaty issues: Limitation of benefit articles, saving clauses, treaty overrides
- Specific anti-avoidance rules: interest-stripping and anti-conduit regulations

Outbound investment

- Foreign tax credit
- Anti-deferral rules
- Outbound transfers: Code section 367

Other issues

- Transfer pricing rules: Code section 482 and regulations
- Anti-avoidance: general case law doctrines and main statutory provisions
- Estate and Gift Tax
- Indirect Taxes: customs duties; state and local sales taxes

IN-DEPTH US INTERNATIONAL CORPORATE TAX

Federal income tax

- Basic rules and concepts
- US taxpayers: individuals, corporations and others
- Entity classification
- Cross-border situations: outbound
- Foreign tax credit: direct and indirect
- Corporate transfers to and distributions from foreign subsidiaries
- Controlled foreign corporations
- Passive foreign investment companies
- Investment in foreign partnerships, etc.
- Cross-border situations: inbound
- US trade or business of a foreign person
- Branch profits tax
- Related party financing of and distributions from US subsidiary:
- Safe harbours for US investment activity
- Anti-conduit rules
- US tax treaties
- The OECD Model and the US Model
- Limitation on benefits provisions
- Transfer pricing
- The US approach to transfer pricing
- Transfer pricing of services and intangibles
- Cross-border mergers and acquisitions
- Tax-free, outbound and inbound reorganisations
- Foreign trusts

Federal estate tax

- Basic rules and concepts
- Cross-border issues
- Relief of double taxation: estate tax treaties

Federal gift tax

- Basic rules and concepts
- US persons and non-resident aliens
- Cross-border issues
- Transfers to non-resident aliens

State and local taxes

- State income taxes on cross-border business
- Jurisdictional issues: nexus and source

TUTOR PROFILES

Ken Almand

Ken advises on all aspects of transfer pricing including planning, assurance and compliance issues, working with multinational groups to develop and implement effective strategies that are aligned with their business and tax policies. With over 15 years' experience across a wide range of transfer pricing matters he specialises in assisting clients with assurance issues, tax authority disputes, business restructuring, and thin capitalisation.

Ken is a partner and head of transfer pricing at Baker Tilly. He previously headed Mazars' transfer pricing team, who he joined from Ernst & Young, Formerly he was an International Tax Specialist working on transfer pricing at HM Revenue and Customs' International Division where he advised on transfer pricing policy and led on complex enquiries and litigation issues. He regularly contributes articles to tax publications and speaks on transfer pricing matters at national and international tax events.

Dr. Emmanuel Llinares

Emmanuel is Head of Global Transfer Pricing at NERA Economic Consulting. He is an economist specialising in inter-company pricing, valuation and IP analyses. Emmanuel has managed pricing projects for multinationals in a wide range of industries and the economic analyses in tax-related audits all over the world. Prior to joining NERA, he was an economist with Arthur Andersen in London and KPMG in Paris. He is a former lecturer at the Economics Dept. of the University of Delaware and at the Ecole Supérieure de Gestion in Paris. He is considered by Euromoney to be one of the world's leading transfer pricing advisers.

Jennifer Paul

Jennifer runs the independent transfer pricing consultancy, Transfer Pricing Consultants Ltd, advising a wide range of clients on planning, documentation and defence. Jennifer previously worked for Deloitte, and for Ernst and Young, as a Director of Transfer Pricing.

A Chartered Accountant and Chartered Tax Adviser, Jennifer has over 20 years' experience of working in transfer pricing. In this time Jennifer spent three years working in Milan, advising inward investors, where she learnt business Italian and experienced the practical aspects of business expansion overseas.

Stéphane Gelin

Stéphane Gelin joined the International Tax department of CMS Bureau Francis Lefebvre as a Partner in June 2003 and is now Head of the CMS Tax Group. He has been advising for nearly 25 years French and foreign multinationals in the area of international tax and transfer pricing. He has been involved in several significant projects in global TP planning, supply chain projects, French and foreign TP documentation and international controversy (including competent authorities, arbitration procedures and APAs).

Before joining CMS Bureau Francis Lefebvre, Stéphane was a Tax Partner with Ernst & Young where he headed the Transfer Pricing practice of the French firm and was a member of E&Y Global Advisory Committee for Transfer Pricing. With E&Y, he spent five years in New York at the International Tax Services of Ernst & Young LLP, where he was responsible for the French Tax Desk, assisting French and U.S. clients involved in cross border transactions.

Stéphane was the National Reporter for the e-commerce topic at the 2001 IFA Congress and a panellist at the 2007 IFA Congress on Cost Sharing Agreements. He is a Board member of the Chartered Institute of Taxation, European Branch. Stéphane is a frequent contributor to various French and international tax journals and has co-authored three books on transfer pricing, "Prix de Transfert", Editions Francis Lefebvre (2010), Guide to International Transfer Pricing, Kluwer (2011) and "Transfer Pricing Manual", BNA (2008). He lectures on Transfer Pricing at the Bourgogne Université (Dijon).

Stéphane Gelin graduated from the Paris *Institut d'Etudes Politiques* in 1986 and obtained a *Maîtrise* and a *DESS* in business and tax law at the *Université de Paris V* (1985). He is a registered lawyer (« Avocat »).

Lee Corrick

Since November 2011 Lee has been a Senior Advisor on Tax Transparency and Transfer Pricing for the OECD. He works in the OECD Tax and Development programme on transfer pricing capacity building in developing countries.

Lee was for the previous two years the Senior Specialist for Transfer Pricing at the South African Revenue Service (SARS). During those two years he was also Technical Adviser on transfer pricing to the African Tax Administration Forum (ATAF) and is continuing to carry out that role.

Lee was responsible at SARS for ensuring the effective implementation of the transfer pricing legislation and advised SARS and the National Treasury on changes to the South African transfer pricing and thin capitalisation legislation. He was also responsible for providing specialist advice on the largest and most complex transfer pricing cases being dealt with by SARS.

Before working for SARS Lee was Assistant Director for Transfer Pricing at HM Revenue and Customs (HMRC) in the UK with responsibility for HMRC's transfer pricing, including its litigation work. He was responsible for ensuring the transfer pricing legislation was fit for purpose and that it was being implemented effectively by HMRC. He led HMRC's work on its largest and most complex transfer pricing disputes and led the HMRC litigation of the DSG Retail Ltd transfer pricing dispute.

He also had responsibility for all HMRC's transfer pricing Mutual Agreement Procedure cases and for the HMRC Advanced Pricing Agreement Programme.

Lee was also South African delegate to OECD Working Party 6 having previously been the UK delegate and WP6 Bureau member.

WHAT DO OTHERS SAY?

Dr Angharad Miller

Angharad is an international tax specialist, with interests in university lecturing, professional lecturing, professional authoring and research. She is a Senior Lecturer at the Business School at Bournemouth University. Angharad is the author of Miller & Oats "Principles of International Tax", the 4th edition of which was published by Bloomsbury Professional in January 2014 (and a copy of which is included in your documentation). She has a BA (Hons) in Accounting & Finance from Lancaster University and is both a CTA and FCA. Earlier this year she completed her PhD on the international taxation of services.

Narelle MacKenzie

Narelle MacKenzie is a well-known international tax consultant, located in San Diego. She has over 25 years' experience working in international taxes, having spent most of her career working with, or for, multinational companies. Narelle is an International Tax lecturer at San Diego State University, first appointed in 2007. She also guest lectures on US international tax issues and California State University San Marcos and has recently developed a post graduate tax course for them.

Narelle seeks to understand the business operations and drivers to ensure that the global tax planning and compliance works in synergy with the business, and maximises the returns to shareholders, whilst ensuring such tax planning is done to the highest ethical standards.

She has worked in both public accounting and industry for employers such as Goodrich Corporation (a Fortune 500 company that was acquired by United Technologies), PricewaterhouseCoopers LLP, and Toyota Australia. Her business experience has covered diverse industries and activities, including supply chain activities and initiatives, identification and implementation of new manufacturing facilities, establishing representative offices, secondment arrangements, customer sales and support initiatives and general cross-border issues.

Narelle has advised on cross-border activities in many and diverse countries and works with tax advisors in those countries to identify optimal, strategic tax solutions for her clients. Some of the various countries experiences include: US (federal and state), Mexico, Brazil, Singapore, China, Scotland, India, Turkey, Japan, Germany, South Korea, Netherlands, Canada, Luxembourg, Chile, Sweden, Norway, Russia, Australia, UK and France.

As well as lecturing at SDSU, she is a highly sought after speaker, course instructor and guest lecturer and has presented at many and diverse conferences including CalCPA, the ABA, CITE, AWSA and PwC.

She is a Past President of CalCPA (San Diego chapter), and currently serves on the Audit Committee for St James by the Sea, La Jolla.

Narelle is an Australian CPA and a Californian CPA.

Below are some of the comments extracted from the evaluation forms completed by participants over the past year:

Another really helpful few days. Practical and really helpful back in the real world!

Very approachable and willing to tailor course to needs, Narelle made sure everyone was included

Very valuable course for me as an overview of US issues, I had very little knowledge before coming

Great presenter, really easy to follow

The fluency and confidence in speaking about complex matters by all the speakers was my highlight

Narelle set a great pace, very knowledgeable and made it come to life with some great examples

Angharad is passionate about the subject, good use of cases to illustrate points

All parts of the course are excellent and Angharad has an excellent teaching style

All of the instructors are highly professional and their presentations were very instructive and stimulating

Excellent knowledge and the information was passed on in a very structured way

I enjoyed the fact that each tutor looked at the topic from their different perspectives

Narelle is a very good teacher with excellent practical knowledge of the subject

There is nothing I would add to or change about this course, it was perfect!