

Application of Tax Treaties

Barbados

11 - 13 October 2010

ITA Online

Fundamentals of Tax Treaties

- The international tax environment
- Double tax relief
- How tax treaties operate
- Role and development of model treaties and commentaries
- The making of tax treaties
- Eligibility to treaty benefits
- Interpretation and dispute resolution
- Policy considerations

(Detailed syllabus: <http://www.ibfd.org/pdf/ITA101Syllabus.pdf>)

Day 1

09.00 - 10.40

Residence

- The concept of residence in domestic law and bilateral tax treaties
 - individuals
 - corporations
- Dual residence issues
- Treaty tiebreaker rules
- Recent developments

10.40 - 11.00

Break – Refreshments

11.00 - 12.45

Permanent Establishment Concept

- Basic rule PE
- Construction site PE
- Agency PE
- Auxiliary and preparatory activities

12.45 - 14.00

Lunch

14.00 - 15.40

Taxation of Investment Income

- Dividends, interest, royalties
- Treaty distributive rules
- Beneficial ownership requirements

15.40 - 16.00

Break - Refreshments

16.00 - 17.00

Case Study

Application of Tax Treaties

Barbados

11 - 13 October 2010

Day 2

09.00 - 11.00 **Business Profits Taxation**

- Introduction
- Allocation of business profits
- Determination of PE's profits
 - Arm's length principle
 - Allocation of expenses
- Recent developments

11.00 - 11.20 Break – Refreshments

11.20 - 12.45 **Immovable Property Taxation**

- Income from immovable property
- Alienation of immovable property
- Real estate companies

12.45 - 14.00 Lunch

14.00 - 15.40 **Employment Income**

- Taxation of dependent personal services
- General rules
- International hiring-out of labour
- Directors' fees
- Artistes and sportsmen

15.40 - 16.00 Break - Refreshments

16.00 - 17.00 **Case Study**

Application of Tax Treaties

Barbados

11 - 13 October 2010

Day 3

09.00 - 10.40 **Non Discrimination and Triangular Cases**

- Article 24 OECD MTC
- Triangular cases involving PEs

10.40 - 11.00 Break – Refreshments

11.00 - 12.45 **Basic Tax Planning**

- Fundamentals of international tax planning
- Types of international tax planning
- Tax planning for holding activities
- Tax planning for financing activities
- Substantive tax planning

12.45 - 14.00 Lunch

14.00 - 15.40 **Anti-Avoidance Rules**

- Domestic anti-avoidance rules
- Treaty anti-avoidance rules
- Limitation of benefits (LOB) clauses

15.40 - 16.00 Break - Refreshments

16.00 - 17.00 **Case Study**