



**Sheltons-SITTI:
Sheltons International Tax Training Institute**

**Information Document on
Interpretation & Application of Tax Treaties**

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discount! See page 6**

**Conducted by Ned Shelton,
international tax adviser and author of the book 'Interpretation & Application of Tax
Treaties' (Lexis Nexis UK, 650 pages)**

City/country	Dates	Fee – per day	Fee – all 3 days
London, United Kingdom	6-8 September 2023	GBP 490	GBP 1,100
Copenhagen, Denmark	TBC 2023	GBP 490	GBP 1,100

More course dates and locations will be published shortly

**London Venue:
TBC**

Sheltons

Sheltons Group is an international tax advisory, international tax training, accountancy and business services firm with offices in London, Sydney, Singapore, Denmark and Malta. Sheltons-SITTI (Sheltons International Tax Training Institute), part of Sheltons Group, has provided international tax training since 1997 in numerous cities throughout the world, often many times in each city.

Ned Shelton

This course is conducted by Ned Shelton.



- Founder and Managing Partner, Sheltons Group (1994)
- www.SheltonsGroup.com N.Shelton@SheltonsGroup.com

Ned Shelton has focused on advising internationally operating clients for more than 25 years, whilst based in Australia and in Europe. Throughout his career, Ned has specialised in international tax, tax treaties and related areas.

Tax treaties has been Ned's primary area of expertise for the past 20 years.

Under the banner of Sheltons-SITTI, Ned has organised and chaired many conferences and conducted numerous courses on international tax in various cities throughout the world.

Ned has conducted courses on an in-house and open basis in 25 cities in Europe, as well as in Singapore, Taiwan, Hong Kong, Mumbai, Delhi, Sydney, Mexico City, Rio de Janeiro, Sao Paulo, Mauritius and Curacao, often several times in each location.

Among in-house clients are international accounting networks, accounting firms, law firms and various multinationals, including some of the world's largest oil and gas operators as well as the major national oil and gas entities in several jurisdictions - including European, Latin American and Asian countries.

Ned has also conducted in-house courses for the South Korean tax office (NTS), the Mexican tax office (SAT) and the Danish tax office (Skat, now Skattestyrelsen) and the Norwegian Tax Administration (NTA).

Apart from the Sheltons-SITTI courses and conferences, Ned has spoken at more than 80 international tax conferences organised by other parties, including universities, professional bodies, government bodies, accounting networks and private firms, in some 35 countries – primarily on the subject of tax treaties and related areas.

Ned is continuously consulted by clients from all over the world on international tax matters, such clients ranging from individuals and funds to publicly-listed multinationals.

Ned has written a 650-page book on *The Application and Interpretation of Tax Treaties* at the request of Butterworths Tolley / Lexis Nexis UK, one of the world's most highly regarded legal publishers.

Ned qualified as a Chartered Accountant in Australia and holds degrees in Commerce and in Law from the University of New South Wales, Sydney. He was a Tax Manager at Arthur Andersens in Sydney before moving to Europe. Before Arthur Andersens he was with Mann Judd (now HLB Mann Judd) in Sydney. With the office of Sheltons Accountants in Sydney, Ned retains his close Australian tax and business interests.

Sheltons is now in its 30th year of business - Ned having commenced Sheltons in the Netherlands in 1994.

Sheltons is an independent owner-managed firm of tax advisers, accountants and business advisers. Our firms in Australia, Malta, Singapore and Denmark are members of ETL. <https://www.etl-global.com/> ET Global is a European cultured professional services firm headquartered in Germany, with more than 50 years of history and a strong SME focus.

Apart from his native English, Ned speaks Danish and reads Dutch, Norwegian and Swedish.

The Course: Interpretation & Application of Tax Treaties

This is a three-day course but one can attend just one or two days if desired. The course progresses from introductory-level at the beginning of the first day to advanced issues on the third day. Ned Shelton explains the essentials of tax treaties, interpreting tax treaties, how treaties apply to international business and investments, and tax treaty planning – with an emphasis on the law and practice in a wide range of countries. The fundamentally important MLI (under the BEPS Project), as well as the tax treaty aspects of ATAD are also covered.

Ned explains the subject of tax treaties in a practical manner with hands-on case studies and group discussions, making the course an essential choice for international tax practitioners and others wanting to improve their understanding of tax treaties.

Course benefits

Participants receive extensive course documentation as well as written solutions to the case studies.

The course will:

- Explain the types of treaties and of tax treaties
- Reviews the object & purpose of tax treaties – including MLI changes
- Give a good understanding of the OECD, UN & US model tax treaties
- Explain how treaties avoid double tax
- Provide a thorough understanding of specific treaty articles
- Cover residency and permanent establishments in detail
- Explain the traps and opportunities found in the treaty articles dealing with immovable property, business profits, dividends, interest and royalties as well as in the area of double tax relief
- Explain the intricacies of applying treaties to hybrid entities and unusual business forms as well as hybrid financial instruments
- Explain how treaties are interpreted and the impact of important cases on treaties
- Explain the interaction between treaty articles
- Cover 'beneficial ownership' and current law and practice in this area in several jurisdictions
- Touch on various countries' digital services tax, 'Google Tax', diverted profits tax and the like - and their relationship with treaties
- Provide a good understanding of the MLI and the tax treaty aspects of ATAD as well as other anti-avoidance measure affecting treaties
- Provide an excellent forum for networking and sharing practical experiences and insights



Target audience – who should attend

The target audience includes in-house corporate tax managers, taxation professionals, lawyers and accountants and banking and finance professionals, who are involved in tax treaties and tax planning, or who have an interest in developing their knowledge of treaties and international taxation. It is also of benefit to tax officials and academics. The first two days of the course are presented at an introductory to intermediate level, however significant parts will be useful to tax managers and professionals at more advanced levels. The third day is pitched at a higher technical level.

Interpretation & Application of Tax Treaties - Course Outline

Day 1 - Introduction to tax treaties and the OECD and UN models

- Case studies (throughout the day)
- Purpose of tax treaties, kinds of treaties, how tax treaties are made, structure of tax treaties
- Tax treaty terminology
- Termination of treaties, dates – date of signature, effective date, date of entry into force
- The OECD and its work in the area of treaties
- The UN and its work in the area of treaties
- The OECD model tax treaty [NB At least one-third of the day is spent on this topic]
- The UN Model compared to the 2017 OECD model tax treaty
- Review of the US Model Treaty
- A brief overview of BEPS (Base Erosion and Profit Shifting) and the MLI (Multilateral Instrument).

Day 2 - Review of tax treaty articles

- Case studies (throughout the day)
- Review of most typical tax treaty articles including an introduction to complex treaty issues
- Treaty articles that vary from the OECD model
- Double taxation – dangers and tax planning opportunities under treaties
- Reference to the law and practice in specific important countries
- A brief overview of ATAD (the EU Anti Tax Avoidance Directive) as it affects treaties
- A further review the MLI (Multilateral Instrument)

Day 3 - Advanced treaty issues

- Case studies (throughout the day)
- Treaties and various entities - including transparent entities, hybrid entities, trusts, funds, cooperatives, etc., including classification of entities and the issue of residency of such entities
- Permanent establishment (PE) issues including
 - When does a PE exist (advanced aspects)?
 - The attribution of profits to a PE
 - Transfer of assets between head office and permanent establishment
 - Shipping and aircraft PEs
 - Other selected PE issues
- Interpretation of treaties
 - The Vienna Convention
 - Main principles
 - Interaction between Article 3(2) and the Vienna Convention
 - The OECD Commentaries
 - Specific country references
 - Current trends
 - Important court decisions and government circulars, etc
 - Update on recent court decisions

- Beneficial ownership – history and current law and practice in various jurisdictions
- Extra-territorial taxation of capital gains on the sale of shares, including references to Australia, India, Kazakhstan and China
- A review of various countries' digital services tax, 'Google Tax', diverted profits tax and the like - and their relationship with treaties
- A further review of ATAD (the EU Anti Tax Avoidance Directive) as it affects treaties
- The MLI (Multilateral Instrument)
- Extensive references to the law and practice in specific important jurisdictions

Testimonials (Ned Shelton)

The course was created by, and is conducted, by Ned Shelton. The following testimonials relate to a tax treaties course that Ned Shelton has conducted recently as well as other similar courses including substantial tax treaty content.

"Excellent! Know a lot more about PE's than I did previously. Working case studies was really useful",
Nicki Shilston, Associate Director, Smith & Williamson Ltd, UK

"Good pace. Good course material. Like the case studies for a) variety, b) technical consolidation. Good to have a presenter who also practices tax law – the asides add 'colour'!" **Pauline Finney, Tax manager, Unilever Plc, UK**

"I think Ned Shelton is one of the best lecturers I have heard; and the contents of the Blue & Silver Courses are indispensable for any tax attorney, so I highly recommend them to all tax specialists."
Ana Bertha Thierry, Senior Attorney and former General Administrator of Large Tax Payers of the Tax Administration Service (SAT) in Mexico, Yanez Franco Et Al, Mexico

"Mr. Ned Shelton's solid experience, knowledge and expertise showed in the Advanced International Taxation Principles & Planning (Silver course). It became a unique opportunity to enrich all participants careers, independent of each one's skill on the subject. It's undoubted that the usefulness of this training Course, surpassed everyone's expectations." **José Francisco de C. Pereira, Senior Analyst - Tax Division, Esso Brasileira de Petroleo Limitada, Brazil**

"Really stretched me personally with lots of learning. Academic, well balanced with practical application and real life examples. Very well presented. Ned is incredibly knowledgeable." **Almari Meyer, Legal Manager, Pepsi Cola International Ltd, South Africa**

"I believe that the Blue Course is indispensable for everyone who works as a tax analyst. Wide and varied concepts are covered, double tax relief, interpretation of tax treaties and many others are good examples; showing how valuable this Blue Course is. The classes are well structured, being alternated with theory, practical content and the case studies. Beyond that I can assure that Mr Shelton is very clear and always available to discuss and solve any queries and doubts." **Henrique Cesar Tupper, Economist Consultant of Tax Planning Department of E&P, Petrobras Petroleo Brasileiro S.A, Brazil**

"The Advanced International Tax (Silver) Course, managed by Mr Ned Shelton; provides great background and knowledge on international tax techniques, including treaty shopping and holding companies structure. I was very impressed with Mr Ned Shelton's expertise. I'm sure that we do not have any other course like it in Brazil!" **Ivan Garcia Ferreira, Regional Senior Tax Manager, Motorola Industrial Ltda, Brazil**

"I attended the Silver Course in Rio where I was the only participant from my country, and I really enjoyed the course very much! What I enjoyed the most was the case studies that we discussed, and of course the tax treaty part of the course also, which is a lot of help to me, in my day to day business. I will be attending your Gold Course and look forward to it!" **Ana Laura Ghislandi, Manager in International Tax Planning, CHT Auditores y Consultores an independent member of Baker Tilly International, Uruguay**

"This is by far the best international tax course I have attended in my 12 year tax career. Ned is sure the subject matter expert!" **Moturnayo Oyelakin, Tax Lead, Seplat Petroleum Development Company Plc, Nigeria**

"The entire course is of great value and absolutely recommendable. I really appreciate Mr. Shelton for lecturing the very "fundamentals" of international taxation at an understandable level and sharing

his rich tax experiences. Moreover, as a translator myself, working with such a renowned tax expert was such a thrill." **Jeeyeon, Tax Dept, Translator, Government National Tax Service, Korea**

Continuing Professional Education

Each course constitutes 6.5 hours of actual tuition per day. The courses are eligible for professional education points and certificates are issued to all participants.

Discounts – up to 30%

For Course Fees see the front page.

20% discount for registering 3 months in advance *or*

10% discount for registering at least 1 month in advance

plus

10% discount for registering for any 2 Sheltons-SITTI courses at the same time *or*

10% discount for 2 people registering for the same course from the same firm at the same time if all participants are dealt with in the same invoice.

Please note that all fees are to be paid net of foreign taxes. If required, we can issue an invoice for the higher gross amount.

How to Register

Registration:

- Fill in the online registration form which can be found under the specific course (under 'Course Overview', <http://www.sheltonsgroup.com/course-overview/>) or
- Send an email to Ms Lucy Beard at L.Beard@SheltonsGroup.com or
- Call Lucy on +44 203 897 4888

Payment & Cancellation policy

Cancellations must be received in writing at least 21 days before the date of the event. Cancellations made within 21 days will be subject to a 50% administration fee, except that regretfully cancellations made within 7 days of the date of the event will not give rise to a refund, even if wishing to transfer to another date or course. You will however, receive a copy of the documentation. You may always send another delegate in your place. We reserve the right to cancel the event if registrations are insufficient, or to alter dates, and accept no responsibility for any loss arising from such cancellation.

Further Information

For further information concerning course content, fees, etc., please contact:

Ned Shelton – N.Shelton@SheltonsGroup.com

For administrative matters, please contact Ms Lucy Beard at:

L.Beard@SheltonsGroup.com.

Sheltons

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