



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

**Information Document on
International Taxation Principles (Blue) Course**

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Qualify for 10%-30%
discount! See page 8

**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 5 days
Copenhagen, Denmark	02-06 September 2024	GBP 600	GBP 2,400
London, United Kingdom	04-08 November 2024	GBP 600	GBP 2,400

More course dates and locations will be published shortly

Copenhagen Venue:

TBC

London Venue:

LANDMARK

flexible workspace

3 Orchard Place, London, SW1H 0BF

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 20 cities in Europe, as well as in Singapore, Taiwan, Seoul, 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), 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 seminars and conferences organised by other parties, including universities, professional bodies, government bodies, accounting networks and private firms, in some 25 countries – primarily on the subject of tax treaties and international tax.

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 31st 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 are all members of ETL. <https://www.etl-global.com/> ETL 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: International Taxation Principles

This course is an introduction to international tax. It is based very much on the syllabus for the module for the ADIT exam on Principles of International Taxation – and is an ideal course for those planning to sit for this exam. See <https://www.tax.org.uk/adit>

To quote ADIT's own description of their module on Principles of International Taxation:

This module gives you the required breadth of knowledge, skills and understanding of international tax, based on the OECD Model Convention, that you need to succeed in your career. Your learning will cover in detail key international tax issues, with particular emphasis on residence, double taxation conventions and treaty interpretation, transfer pricing, the work of the OECD, and international tax avoidance.

Our emphasis is on practical international tax and includes specific concrete examples and real life case studies – with written 'solutions'.

The course is focused on international tax principles, and how they affect international business operations and tax planning. The case studies are focused on understanding the key concepts in international tax, and learning to identify the key issues for tax planning and avoiding pitfalls.

The course can be attended for the week; you can enrol for one of two phases or attend for just one day:

Phase One - Principles of International Taxation (days one and two). This reviews various kinds of taxes and taxpayers including branches, trusts, hybrid entities and takes a thorough look at residency and source. This includes various case studies.

Phase Two - tax treaties and selected international tax topics (days three to five). This includes: thin-capitalisation, CFC, EU Parent-Subsidiary Directive, a day on tax treaties, EU taxation, transfer pricing, and anti-avoidance – including BEPS, the ATAD and the MLI. This includes various case studies.

Course benefits

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

The course will:

- Give you an essential background in international tax principles
- Explain the application of tax treaties to your business operations
- Explain the effect of cross-border withholding tax on dividends, interest and royalties
- Explain the essential business structures of branches and subsidiaries



- Review tax transparent entities such as partnerships and explain their advantages
- Explain tax planning for international dividend, interest and royalty flows
- Set out the essential principles of transfer pricing and anti-avoidance rules
- Bring you up to date with the latest in the area of BEPS, the ATAD and the MLI
- Enable you to network with other tax professionals and discuss their knowledge
- Give an excellent grounding in the essentials of international tax

Target Audience

The Blue Course is designed for persons who either

- have a good knowledge of domestic taxation in at least one jurisdiction, or
- have significant international business experience where tax has often played a role.

You are not expected to have any international tax education or experience, but by the end of the week you will have developed substantial knowledge. You might have some knowledge of international tax but need to have it refreshed, or want your existing knowledge confirmed.

The target audience includes in-house corporate tax staff, taxation professionals, lawyers and accountants and banking and finance professionals, who are involved with internationally operating businesses. It is also of benefit to tax officials and academics.

International Taxation Principles - Course Outline

5 day course

Timing - 09:00 until 17:00 from Monday until Thursday and 09:00 until 15:30 on Friday

The below course outline is being revised

DAY 1

- Introduction
 - Case study 1: The nine choices – investing into Malaysia
 - International tax
- International Tax
 - Tax Consolidation
 - Carry forward of tax losses
 - Important concepts and terminology
 - Sources of international tax
- Forms of doing business
 - Companies
 - Branches (permanent establishments)
 - Rep. offices (representative offices)
 - Partnerships
 - Hybrid entities & transparency vs non-transparency
 - Trusts and foundations
 - Funds SICAVs, UCITs, etc.
 - Cooperatives & associations
 - European Economic Interest Groupings (EEIGs)
 - The SE – The European Company
 - Private equity funds
- Types of tax
 - Income versus capital
 - Corporate tax
 - Branch profits tax (BPT)
 - Income tax – comprehensive vs schedular systems

- Capital gains tax
- Payroll tax
- Indirect taxes
- Transfer taxes
- Capital tax/formation tax/capital duty
- Real estate tax
- And more
- Case study 2

DAY 2

- Factors determining the scope of tax liability
 - Residence & source taxation vs. territoriality
 - Residence
 - Source taxation
- Case study 4: The scope of tax liability
- Double taxation – juridical & economic
 - Juridical double taxation
 - Economic double taxation
- Double tax relief
 - Methods - credit, exemption and deduction
 - Relief from juridical taxation
 - Relief from economic double taxation
 - Tax sparing credits
- Case study 5: Corporate tax systems and relief from economic double taxation

DAY 3

- Introduction
 - Purpose of tax treaties
 - Types of tax treaties
 - Structure of tax treaties
 - The main provisions of tax treaties (other than the limitation rules)
 - The limitation rules
- Introduction to interpretation of tax treaties
 - The main treaty rule - Article 3 (2)
 - Different classification as a tool in international tax planning
- Article 4 – residency
- Residence of companies under treaties
- Case study 6: Corporate residence – treaties
- Residence of individuals under treaties
- Article 5 – permanent establishment definition
- Application of treaties to selected items of income
 - Article 6: Income from immovable property
 - Article 7: Allocation of profits to a permanent establishment
 - Article 10: Dividends
 - Article 11: Interest
 - Article 12: Royalties
 - Article 13: Capital gains
 - Article 15: Income from employment
 - Article 16: Directors fees
 - Article 21: Other income
- Double tax relief
- Case study 7: Treaty application – Australia-United Kingdom treaty

DAY 4

- Treaties (continued)
- Anti-avoidance provisions under domestic law
- Controlled Foreign Company (CFC) taxation
 - What is a CFC?
 - How do CFC rules operate?
 - Types of CFC income
 - Specific Issues
- Thin-capitalisation
 - Concept
 - Anti-avoidance approaches
- EU law, including
 - ECJ decisions
 - EU Parent-Subsidiary Directive
 - EU Interest & Royalties Directive
- Case study 8: Treaties, EU and other issues
- The principles of transfer pricing
- Case study 9: Transfer pricing

DAY 5

- Anti-avoidance measures affecting treaties
 - Treaty shopping vs avoidance of domestic rules
 - Anti-avoidance measures under domestic law
 - Anti-avoidance measures under tax treaties
- ATAD (EU Anti Tax Avoidance Directive)
- BEPS (Base Erosion & Profit Shifting) including the MLI (Multilateral Instrument)
- Case study 10: Final case study

Testimonials (Ned Shelton)

The Blue Course, as well as the Silver Course and the Tax Treaties Course, were created by, and are conducted, by Ned Shelton.

Testimonials regarding the Blue and Silver Courses

The following testimonials relate to Blue and Silver Courses that Ned Shelton has conducted.

"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**

Testimonials regarding the Tax Treaty Course

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.

"For me this was a very good course. This was a perfect mixture of practical and theoretical knowledge. Also, very positive aspect was a comparability of different tax systems." **Kamil Smarzewski, KPMG Tax, Poland**

"Excellent!" **Marta Kruszewska, KPMG Tax, Poland**

"Great course expanding my knowledge over the horizon." **Mariusz Głodek, KPMG Tax, Poland**

"The Treaty Course came at the right time. I had questions relating to my client which all got answered. I have done many international tax courses, but this was the best one since I can use it on my daily work" **Anette Holzinger, Partner, MGR, UK**

"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**

In-house Courses

We have presented in-house international tax courses for PricewaterhouseCoopers, Shell, Standard Chartered Bank, KPMG, Credit Suisse, and many other companies worldwide as well as smaller accounting networks and group of firms joining up for an in-house firm. The in-house format enables us to tailor the content to your staff training requirements, and we offer significant discounts where there are 20 or more attendees. Please contact us if you are interested in an in-house course for your organisation.

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:

- Please head to the 'Course Overview' page on our website (see link below). Once on the 'Course Overview' page, please click on the course that you are interested in attending. Click on 'Register here' and fill out the online registration form ('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.

Laptops – and Course Material

At Sheltons-SITTI, we have made the decision to go paperless. We no longer print hard copies of the course material. The course material will be emailed to participants on day 1 and the case study answers will be emailed to you at the end of the course. **It is important that you bring your laptop and UK plug adapter (if needed) with you to the course.**

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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