



Professor Francisco Bastida

Dr Usha Rajagopalan

Course Specifications

| | |
|----------------------|---|
| Course Title: | INTERNATIONAL TAX |
| Course Code: | ACC454 |
| Program: | BACHELOR OF SCIENCE IN ACCOUNTING |
| Department: | ACCOUNTING |
| College: | COLLEGE OF BUSINESS ADMINISTRATION |
| Institution: | PRINCE SULTAN UNIVERSITY |

National Accreditation



International Accreditation



Table of Contents

| | |
|---|----------|
| <u>A. Course Identification</u> | 3 |
| <u>6. Mode of Instruction (mark all that apply)</u> | 3 |
| <u>B. Course Objectives and Learning Outcomes</u> | 3 |
| <u>1. Course Description</u> | 3 |
| <u>2. Course Main Objective</u> | 3 |
| <u>3. Course Learning Outcomes</u> | 4 |
| <u>C. Course Content</u> | 4 |
| <u>D. Teaching and Assessment</u> | 4 |
| <u>1. Alignment of Course Learning Outcomes with Teaching Strategies and Assessment Methods</u> | 4 |
| <u>2. Assessment Tasks for Students</u> | 5 |
| <u>E. Student Academic Counseling and Support</u> | 5 |
| <u>F. Learning Resources and Facilities</u> | 5 |
| <u>1.Learning Resources</u> | 5 |
| <u>2. Facilities Required</u> | 5 |
| <u>G. Course Quality Evaluation</u> | 6 |
| <u>H. Specification Approval Data</u> | 6 |

A. Course Identification

| |
|--|
| 1. Credit hours: 3 |
| 2. Course type |
| a. University <input type="checkbox"/> College <input type="checkbox"/> Department <input checked="" type="checkbox"/> Others <input type="checkbox"/> |
| b. Required <input checked="" type="checkbox"/> Elective <input type="checkbox"/> |
| 3. Level/year at which this course is offered: Year 4 (Semester 2) |
| 4. Pre-requisites for this course (if any): CORPORATE REPORTING AND GOVERNANCE (ACC 317) |
| 5. Co-requisites for this course (if any): None |

6. Mode of Instruction (mark all that apply)

| No | Mode of Instruction | Contact Hours | Percentage |
|----|-------------------------|---------------|------------|
| 1 | Traditional classroom | X | 70% |
| 2 | Blended | | |
| 3 | E-learning | X | 30% |
| 4 | Correspondence | | |
| 5 | Other (IT applications) | | |

7. Actual Learning Hours (based on academic semester)

| No | Activity | Learning Hours |
|------------------------------|--|----------------|
| Contact Hours | | |
| 1 | Lecture | 39 |
| 2 | Laboratory/Studio | - |
| 3 | Tutorial | - |
| 4 | Others (Major examinations, Review week) | 6 |
| | Total | 45 |
| Other Learning Hours* | | |
| 1 | Study | 45 |
| 2 | Assignments | |
| 3 | Library | 10 |
| 4 | Projects/Research Essays/Theses | 15 |
| 5 | Others (specify) | |
| | Total | 70 |

* The length of time that a learner takes to complete learning activities that lead to achievement of course learning outcomes, such as study time, homework assignments, projects, preparing presentations, library times

B. Course Objectives and Learning Outcomes

1. Course Description

This course provides an understanding on issues surrounding the taxation of cross-border activities. The course will consider the key concepts of international taxation, double taxation agreements, transfer pricing and tax avoidance.

2. Course Main Objective

This course is modelled against the course content of Principles of International taxation in the Advanced Diploma of International Taxation, offered by the Chartered Institute of Taxation. Upon completion of this course, students should be well equipped with the needed knowledge to attempt the Advance Diploma of International Tax offered by CIOT.

3. Course Learning Outcomes

| CLOs | | Aligned PLOs |
|------|--|--------------|
| 1 | Knowledge: | |
| 1.1 | Demonstrate a thorough understanding of fundamental tax concepts; residence, double taxation and double taxation relief, Double Tax Agreements, international tax avoidance, residents and non-residents tax in different jurisdictions. | PLO 1.1 |
| 1.2 | Describe understanding of the different types of taxation systems around the world. | PLO 1.1 |
| 2 | Skills : | |
| 2.1 | Apply the fundamental concepts of international taxation, double tax conventions and tax avoidance to practical scenarios and problems. | PLO 2.1 |
| 2.2 | Compare different transfer pricing methods and determine the applicable method in situations. | PLO 2.1 |
| 3 | Competence: | |
| 3.1 | Ability to articulate and communicate tax related issues effectively. | PLO 3.3 |

| CLOs | | SAQF PLOs | AACSB LO | AACSB LG | Level of Instruction AACSB* |
|------|---|-----------|----------|----------|-----------------------------|
| 1 | Knowledge: | | | | |
| 1.1 | Demonstrate a thorough understanding of fundamental tax concepts; double taxation and double taxation relief, Double Tax Agreements, international tax avoidance, residents and non-residents tax in different jurisdictions. | PLO 1.1 | LO 1.1 | LG1 | M |

| | | | | | |
|----------|---|---------|--------|-----|---|
| 1.2 | Describe understanding of the different types of taxation systems around the world. | PLO 1.1 | LO 1.1 | LG1 | M |
| 2 | Skills : | | | | |
| 2.1 | Apply the fundamental concepts of international taxation, double tax conventions and tax avoidance to practical scenarios and problems. | PLO 2.1 | LO 2.1 | LG2 | M |
| 2.2 | Compare different transfer pricing methods and determine the applicable method in situations. | PLO 2.1 | LO 2.1 | LG2 | M |
| 3 | Competence: | | | | |
| 3.1 | Ability to articulate and communicate tax related issues effectively. | PLO 3.3 | LO 5.1 | LG5 | M |

Note: AACSB: I = Introduced; R = Reinforced; M = Mastery

C. Course Content

| No | List of Topics | Contact Hours |
|----|---|---------------|
| | <p>Basic principles of international tax law</p> <ul style="list-style-type: none"> • Jurisdiction to tax • Taxes and tax systems • State practice in exercising tax jurisdiction • Causes of international double taxation • Methods of relief from international double taxation • Private international law and taxation • History of international tax law • Taxation and international human rights instruments | 9 |
| | <p>Double Taxation Conventions (DTCs) focusing on the current version of the OECD Model Tax Convention (MTC)</p> <ul style="list-style-type: none"> • Types of DTCs (limited, multilateral etc.) and negotiation of DTCs • DTCs and domestic law • Format and structure of a DTC • Approach to the application of a DTC: applying a DTC to a concrete scenario • Provisions relating to the scope of a DTC • Key definitional provisions • DTC provisions relating to businesses • DTC provisions relating to individuals • DTC provisions relating to investment income and gains • Relevance of the “other income” Article – Art. 21 OECD MTC • 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 • The digital economy | 9 |

| | | |
|--|--|-----------|
| | | |
| | <p>Transfer pricing (TP) and thin capitalisation rules:</p> <ul style="list-style-type: none"> • Various approaches to the determination of profits of branches and associated enterprises • State practice with respect to transfer pricing • Transfer pricing and DTCs • The OECD Transfer Pricing Guidelines 2017 • Transfer pricing and BEPS • Transfer Pricing and developing countries • State practice with respect to thin capitalization • Thin capitalisation legislation and DTCs | 9 |
| | <p>International Tax Avoidance</p> <ul style="list-style-type: none"> • Tax Haven • Domestic law approaches to international tax avoidance • Money-laundering legislation and international tax avoidance • Co-operation between revenue authorities • Conventions for administrative assistance in tax administration • Base Erosion and Profit Shifting (BEPS) | 9 |
| | <p>Miscellaneous topics</p> <ul style="list-style-type: none"> • Indirect taxes and international taxation • Cross-border mergers • Estate and gift taxation and international issues | 3 |
| | Revision | 3 |
| | Exam (Majors) | 3 |
| | | |
| | | |
| | | |
| | Total | 45 |

D. Teaching and Assessment

1. Alignment of Course Learning Outcomes with Teaching Strategies and Assessment Methods

| Code | Course Learning Outcomes | Teaching Strategies | Assessment Methods |
|------|---|---------------------------|---------------------|
| 1.0 | Knowledge | | |
| 1.1 | Demonstrate a thorough understanding of fundamental tax concepts; residence, double taxation and double taxation relief, Double Tax Agreements, international tax | Lectures and case studies | Exams & Assignments |

| Code | Course Learning Outcomes | Teaching Strategies | Assessment Methods |
|------------|---|---------------------------|-----------------------------------|
| | avoidance, residents and non-residents tax in different jurisdictions. | | |
| 1.2 | Describe understanding of the different types of taxation systems around the world. | Lectures and case studies | Exams & Assignments |
| 2.0 | Skills | | |
| 2.1 | Apply the fundamental concepts of international taxation, double tax conventions and tax avoidance to practical scenarios and problems. | Lectures and case studies | Exams & Assignments |
| 2.2 | Compare different transfer pricing methods and determine the applicable method in situations. | Lectures and case studies | Exams & Assignments |
| 3.0 | Competence | | |
| 3.1 | Ability to articulate and communicate tax related issues effectively. | Case studies | Group assignment and presentation |

2. Assessment Tasks for Students

| # | Assessment task* | Week Due | Percentage of Total Assessment Score |
|---|----------------------------------|------------|--------------------------------------|
| 1 | Assignments (Individual & Group) | Continuous | 30% |
| 2 | Mid-Term Exam | 9 | 30% |
| 3 | Final Exam | 16 | 40% |

*Assessment task (i.e., written test, oral test, oral presentation, group project, essay, etc.)

E. Student Academic Counseling and Support

Arrangements for availability of faculty and teaching staff for individual student consultations and academic advice:

6 office hours weekly are allocated for students' consultation. (4 office hours and 2 academic advising hours)

F. Learning Resources and Facilities

1. Learning Resources

| | |
|---------------------------------------|---|
| Required Textbooks | Van Raad, K. Materials on International, TP and EU Tax Law 2020-2021. Volume A (Leiden: International Tax Centre, 2020) |
| Essential References Materials | <ul style="list-style-type: none"> OECD. Base Erosion and Profit Shifting Project: 2015 Final Reports, Executive Summaries (Paris: OECD, 2015) Available from the OECD: www.oecd.org/ctp/beps-reports-2015-executivesummaries.pdf OECD, Committee on Fiscal Affairs. Model Tax Convention on Income and on Capital (Paris: OECD, 2017) [ISBN: 9789264287945] Available from the OECD: www.oecd- |

| | |
|---------------------------------|---|
| | <p>ilibrary.org Or available from Turpin Distribution: ebiz.turpin-distribution.com</p> <ul style="list-style-type: none"> • OECD, Committee on Fiscal Affairs. Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations (Paris: OECD, 2017) [ISBN: 9789264262737] Available from the OECD: www.oecd-ilibrary.org Or available from Turpin Distribution: ebiz.turpin-distribution.com • OECD. Action Plan on Base Erosion and Profit Shifting (Paris: OECD, 2013) [ISBN: 9789264202702] Available from the OECD: www.oecd-ilibrary.org |
| Electronic Materials | Moodle (LMS) |
| Other Learning Materials | Other textbooks titles to be included here |

2. Facilities Required

| Item | Resources |
|--|--|
| <p>Accommodation (Classrooms, laboratories, demonstration rooms/labs, etc.)</p> | <ul style="list-style-type: none"> • Classroom with 25 seating capacity |
| <p>Technology Resources (AV, data show, Smart Board, software, etc.)</p> | <ul style="list-style-type: none"> • Smartboard (Overhead projector and Screen) • Whiteboard • LMS, Google Meet • CMA Learning Resources |
| <p>Other Resources (Specify, e.g. if specific laboratory equipment is required, list requirements or attach a list)</p> | Laptop |

G. Course Quality Evaluation

| Evaluation Areas/Issues | Evaluators | Evaluation Methods |
|---|----------------------------------|---|
| Effectiveness of teaching and assessment | Course leader Program leaders | Direct assessment – Classroom observation Indirect assessment - Course Evaluation Survey |
| Extent of achievement of course learning outcomes | Faculty | Direct assessment – Academic assessment (AOL) Rubrics assessment Indirect assessment Course Evaluation Survey |
| Quality of learning resources | Student | Indirect assessment Course Evaluation Survey |
| Action Plan continuity (Closing the loop) | AOL Committee and course leaders | AOL Report |
| | | |
| | | |

| Evaluation Areas/Issues | Evaluators | Evaluation Methods |
|-------------------------|------------|--------------------|
| | | |

Evaluation areas (e.g., Effectiveness of teaching and assessment, Extent of achievement of course learning outcomes, Quality of learning resources, etc.)

Evaluators (Students, Faculty, Program Leaders, Peer Reviewer, Others (specify))

Assessment Methods (Direct, Indirect)

H. Specification Approval Data

| | |
|---------------------|----------------------------------|
| Council / Committee | Department of Accounting Council |
| Reference No. | Meeting No. 1 |
| Date | August 9, 2020 |