

# Course Syllabus

## Name of course: International Taxation

Year:2020-2021

Code: P230001207 and P436001206

Coordinating professor: Francesco Cortellese

Degree program: Global Bachelor Degree in International Business

School: Social Sciences and Communication

Languages: English

## 1. BASIC INFORMATION

<b>Course</b>	International Taxation
<b>Degree program</b>	Global Bachelor Degree in International Business
<b>School</b>	Social Sciences and Communication
<b>Year</b>	2020-2021
<b>ECTS</b>	6 credits ECTS
<b>Credit type</b>	Degree Requirement
<b>Language(s)</b>	English
<b>Delivery mode</b>	Face-to-face
<b>Semester</b>	1º/2º
<b>Academic year</b>	2020-2021
<b>Coordinating professor</b>	Dr Francesco Cortellese

## 2. PRESENTATION

This subject is taught in the second year of the International Business degree and involves the presentation of fundamental knowledge of international taxation and tools which enables the student to start working with international taxation in practice. The subject will, among other things, give the student knowledge of: fundamental of international tax principles; international double taxation; double tax treaties; tax avoidance rules and the directives and measures of the European Union. All the Learning Units will take into consideration the initiatives made by the OECD through the BEPS project. Researches will be carried out in order to deepen the understanding of the subject. You will find a detailed program in the annex.

## 3. COMPETENCIES AND LEARNING OUTCOMES

### Basic Skills:

- BS2: Students must apply their knowledge to their work and vocation in a professional way and must demonstrate their skills in sustaining arguments and solving problems within their field of study
- BS3: Students must be able to gather data, usually within their field of study, interpret it and make judgments and considerations on relevant social, scientific or ethical issues.

- BS4: Students must be able to convey information, together with ideas, problems and solutions to a specialized or non-specialized audience

**Cross-disciplinary skills:**

- CS3: Capacity to adapt to new situations: Being able to assess and understand different situations, adapting our approach to a situation insofar as is necessary or appropriate.
- CS5: Capacity to apply knowledge: Being able to use knowledge acquired in academic contexts in situations that resemble as closely as possible the reality of the chosen future profession.
- CS7: Ethical values: The ability to think and act according to universal principles based on individual worth and full development of the human personality, and which entails a commitment to certain social values.
- CS8: Information management: The ability to find, select, analyze and integrate information from different sources.

**Specific Skills:**

- SS2: Capacity to define, design, explain and apply the international business process and the different phases that comprise it: planning, organization, management and control.
- SS8: Capacity to use the management tools available in the area of administration and finance, in the context of international business.
- SS12: Ability to understand and evaluate the legal framework when making strategic business decisions in new competitive environments.
- SS17: Ability to select the best financial planning and operational options, which are then implemented in the markets and companies in which the business activity takes place, in the context of globalized and interdependent environments.

**Learning outcomes:**

- LO1: Knowledge of the foundations of international tax planning;
- LO2: Understanding of the basic principles of international taxation.
- LO3: Understanding of the particularities of international double taxation, international tax transparency and tax havens.
- LO4: Conducting research that highlights the deepening and integration of the subjects described

The following table shows the relationship between the competencies developed during the course and the learning outcomes pursued:

Competencies	Learning outcomes
BS1, BS2, BS3, CS3, CS5, CS7, CS8, SS2, SS8, SS12, SS17	LO1
BS1, BS2, BS3, CS3, CS5, CS7, CS8, SS2, SS8, SS12, SS17	LO2
BS1, BS2, BS3, CS3, CS5, CS7, CS8, SS2, SS8, SS12, SS17	LO3
BS1, BS2, BS3, CS3, CS5, CS7, CS8, SS2, SS8, SS12, SS17	LO4

## 4. CONTENT

The program will include the following content:

- Principles of international taxation;
- Tax jurisdiction: the right to tax resident and non-resident;
- Unilateral measures and Double tax treaty to reduce double taxation;
- Taxing the foreign persons both juridical and natural;
- The Spanish Tax Law
- The BEPS project:
  - Multilateral Legal Instrument.
  - Treaty shopping.
  - Transfer Pricing (TF).
  - Controlled Foreign Company (CFC).
  - Thin Capitalization (interest limitation).
  - Mutual Agreement Procedures (MAP).
  - Tax arbitrage.
- The EU: tax directive and VAT
- Tax Havens

## 5. TEACHING-LEARNING METHODOLOGIES

The types of teaching-learning methodologies used are indicated below:

The following table shows how the different types of activities are distributed and how many hours are assigned to each type:

1. Master class
2. Case study method
3. Cooperative learning
4. Problem-based learning

## 6. LEARNING ACTIVITIES

Listed below are the types of learning activities and the number of hours the student will spend on each one:

CAMPUS-BASED LEARNING ACTIVITIES		Number of hours
1	Master classes	40h
2	Self-directed study	30h
3	Formative assessment	10h
4	Resource search and selection of information sources	25h
5	Tutorial/advising sessions	10h
6	Written assignments and reports	20h
7	Case studies	10h
	Total	150h

## 7. ASSESSMENT

Listed below are the assessment systems used and the weight each one carries towards the final course grade:

Assessable activities	Assessment criteria	Weight (%)
Ongoing in class and homework activities based on learning by doing	Students should show an understanding of the theoretical aspects and, at the same time, apply it in different exercises and/or case studies. Moreover, students should know how to act as a team player	30%
Class participation	Students should show an attitude and class participation in line with that one required from the course. Moreover, they have submitted the 90% of the graded activities.	5%
Mid-term exam	Students should show an understanding of the theoretical aspects and, at the same time, apply it in different exercises and/or case studies.	10%
Research Project	In the second exam period, <b>the mid-term exam will be replaced by a research project</b> , Students should show an understanding of the theoretical and practical aspects of a specific area or case of international taxation	10%
Group Project	Students should show an understanding of the theoretical aspects and, at the same time, apply it in different exercises and/or case studies. Moreover, students should know how to act as a team player	25%
Final Exam(s)	Students should show an understanding of the theoretical aspects and, at the same time, apply it in different exercises and/or case studies.	30%

When you access the course on the *Campus Virtual*, you'll find a description of the assessment activities you have to complete, as well as the delivery deadline and assessment procedure for each one.

### 7.1. First exam period

To pass the course in the first exam period, you must obtain a final course grade of at least 5 out of 10 (weighted average).

In any case, you will need to obtain a grade of at 4.0 in the final exam in order for it to count towards the final grade along with all the grades corresponding to the other activities.

### 7.2. Second exam period

To pass the course in the second exam period, you must obtain a final grade of at least 5 out of 10 (weighted average).

In any case, you will need to obtain a grade of at 4.0 in the final exam in order for it to count towards the final grade along with all the grades corresponding to the other activities.

The student must deliver the activities not successfully completed in the first exam period after having received the corresponding corrections from the professor, or those that were not delivered in the first place. Moreover, they have to submit a research project which grade substitute that one of the mid-term exam.

## 8. SCHEDULE

Learning Unit	Description	Week
<b>LU1: Principles of International Taxation</b>	Students will be introduced to: <ul style="list-style-type: none"> <li>- Principles of taxation and of international taxation;</li> <li>- Principles of international taxation;</li> <li>- the concepts of and the players in international taxation.</li> </ul>	Week 1-2
<b>LU2 Tax Jurisdiction</b>	Students will be introduced Tax jurisdiction: <ul style="list-style-type: none"> <li>- the right to tax resident and non-resident;</li> <li>- the concept of tax residence (individuals and companies) and tax non-residence (Permanent Establishment)</li> </ul>	Week 3-4
<b>LU3: Relief Methods of Double Taxation</b>	Students will resolve problems of double taxation using the following relief methods: <ul style="list-style-type: none"> <li>- Credit Method;</li> <li>- Exemption Method;</li> <li>- Ordinary Credit Method;</li> <li>- Exemption with Progression Method;</li> <li>- Indirect Credit Foreign Method.</li> </ul> Moreover, they will be able to highlight the advantages and disadvantages of each method in different situations	Week 5-6
<b>Mid-Term Exam</b>	Students will answer multiple choice questions, define specific terms and solve problems of double taxation using the relief methods.	Week 7
<b>The case of Spain</b>	Spanish legislation: <ul style="list-style-type: none"> <li>- Taxation of foreign income (outbound transactions) of resident persons;</li> <li>- Taxation of foreign (non-residents) persons (inbound transactions)</li> </ul>	Week 8-9
<b>LU4: Double Tax Treaties (DTTs)</b>	Students will analysis Double Tax Treaties (DTTs) taking into consideration the Model Tax Convention (MTC) published by the OECD and the effect of the BEPS project. In particular, they will study: <ul style="list-style-type: none"> <li>- the characteristics of a Double Tax Treaty;</li> <li>- the Multilateral Legal Instrument (MLI);</li> <li>- treaties shopping;</li> <li>- Mutual Agreement Procedures and Arbitration;</li> <li>- Tax arbitrage via hybrid mismatch arrangements.</li> </ul>	Week 10-12
<b>LU5: Anti-Tax Avoidance Rules</b>	Students will be able to identify and solve problems related to: <ul style="list-style-type: none"> <li>- Transfer Pricing;</li> <li>- Controlled Foreign Companies (CFC);</li> <li>- Thin capitalization (Interest limitation)</li> </ul>	Week 13-13
<b>LU6: European Union Taxation</b>	Students will introduce to: <ul style="list-style-type: none"> <li>- EU legislative processes;</li> <li>- EU Directives on Tax law;</li> <li>- Value Added Tax (VAT);</li> <li>- Tax Havens</li> </ul>	Week 14
<b>Revision</b>	Students have time to review some concept and exercises	Week 15-16

<b>Group Presentation</b>	Students, after choosing two countries, should analyse and compare how each country applies the different aspects of international taxation.	Week 17
<b>Final Exam</b>	Students will answer multiple choice questions, define specific terms and solve problems of double taxation using the relief methods, transfer pricing and thin capitalization.	Week 18

This schedule may be subject to changes for logistical reasons relating to the activities. The student will be notified of any change as and when appropriate.

When you access the course on the *Campus Virtual*, you'll find a description of the activities you have to complete, as well as the deadline and assessment procedure for each one.

## 9. BIBLIOGRAPHY

Recommended bibliography:

Materials for the lesson will be uploaded in the Blackboard. Nevertheless, since some of it will only be basic information, students are encouraged to complete the content of lectures using reference materials in English, Spanish or their native language. Recommended material:

- Reports published by the OECD: [www.oecd.org](http://www.oecd.org);
- Reports and Directives published by the European Commission: [www.ec.europa.eu](http://www.ec.europa.eu);
- Tax Case law from the European Court of Justice: [www.ec.europa.eu](http://www.ec.europa.eu);
- Book: Principles of international taxation, Author: Angharad Miller, Published by: Tottel Publishing; Publish date: 2017.

## 10. DIVERSITY MANAGEMENT UNIT

Students with specific learning support needs:

Curricular adaptations and adjustments for students with specific learning support needs, in order to guarantee equal opportunities, will be overseen by the Diversity Management Unit (UAD: Unidad de Atención a la Diversidad).

It is compulsory for this Unit to issue a curricular adaptation/adjustment report, and therefore students with specific learning support needs should contact the Unit at [unidad.diversidad@universidadeuropea.es](mailto:unidad.diversidad@universidadeuropea.es) at the beginning of each semester.

## 11. ONLINE SURVEYS

Your opinion matters! The Universidad Europea encourages you to participate in several surveys which help identify the strengths and areas we need to improve regarding professors, degree programs and the teaching-learning process. The surveys will be made available in the "surveys" section in virtual campus or via e-mail. Your assessment is necessary for us to improve. Thank you very much for your participation