### Objective/Outcome

- **Objective**
  - The knowledge and lessons on rules, systems, and administration of appropriate international taxation mastered by participants through the training shall be shared among administrative authorities for national taxes after their returning home.

- **Outcome**
  1. Clarify basic rules and systems of international taxation
  2. Acquire technical knowledge on rules of international taxation
  3. Clarify lessons on necessary practical skills for appropriate administration of international taxation
  4. Share the knowledge and lessons on rules, systems, and administration of international taxation among relevant departments of tax authorities after participants’ returning home

### Target Organization / Group

- **Target Organization**
  - Administrative authorities for national taxes excluding customs

- **Target Group**
  1. Middle-class officials who are engaged (or had been engaged within the last 3 years) in tax examination in international taxation
  2. Have sufficient knowledge and experience in tax examination in international taxation
  3. Be proficient in English.

### Contents

1. Lectures on outline of international taxation, tax treaty, mutual agreement procedures, and exchange of information
2. Lectures on transfer pricing taxation, advance pricing arrangement, tax system against tax havens (i.e. taxation on Controlled Foreign Corporations), Thin capitalization system, and Foreign tax credit system
3. Case studies on transfer pricing taxation and advance pricing arrangement, lectures and case studies on international tax avoidance and interpretation of tax treaty articles
4. Presentation and discussion of Job Report on current situation and issues of international taxation and Auditing Case Report in respective participants’ countries
5. Formulation of a plan on sharing the knowledge and lessons which participants have mastered through the seminar
6. Implementation of the plan above
7. Formulation of Final Report on the result of implementation of the plan

### Implementing Partner

- National Tax College, National Tax Agency

### Cooperation Period

- 2016～2018