

Cir. Nr. 4650/2018/123

Beirut 2nd, May 2018

Dear Colleague,

Subject: International Taxation for shipping companies- A practical course.

Please find attached the invitation of “Hayes Training Solutions” to participate in the seminar, 2-day course master classes, which will take place at Beirut, Lebanon on May 16/17, 2018, May 23/24, 2018, and May 30/31, 2018.

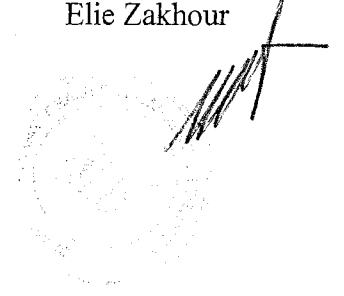
Colleague who may be interested in participating in this seminar, is kindly requested to advise the General Secretariat of our Chamber accordingly.

Thanks & best regards,

President

Elie Zakhour

Att.: invitation of “Hayes Training Solutions”.



International Taxation for Shipping Companies - A Practical Course

2 Day Course Agenda:

Welcome and IBFD Overview

Introduction

- Role of comprehensive tax treaties
- Relationship between tax treaties, domestic law and EU law
- The format and structure of a tax treaty (OECD and UN Model Tax Conventions)
- Scopes of tax treaties
 - taxes
 - persons
 - territories covered
- Types of allocation rules in treaties

Double Tax Relief Methods

- Double tax relief methods □ credit and exemption
- Losses and double tax relief
- Limitations on relief
- Conditions for relief
- Tax sparing credits

Residence

- The concept of residence
 - individuals
 - corporations
- US savings clause
- Treaty tiebreaker rules
- Dual residence issues

Case Study

Permanent Establishment Concept

- Basic rules for the permanent establishment (PE) concept
- Auxiliary and preparatory activities
- Construction site PEs
- Agency PEs
- Service PEs
- E-commerce

Permanent Establishment Concept (continued)

Case Study

Profits of an Enterprise

- Article 7 of the OECD Model
- Determination of business profits
 - arm's length principle
 - allocation of expenses
- Further developments
- Article 8 of the OECD Model
- Case study

Profits of an Enterprise (continued)

Passive Income

- Income from immovable property
- Dividends, interest, royalties
- Beneficial ownership
- Capital gains
- Article 21 of the OECD Model

Case Study

Basic Tax Planning Schemes

- Holding companies, hybrid entities and hybrid financial instruments
- Debt push-down and acquisition financing
- Double dips
- Withholding tax planning
- Financing structures

Basic Tax Planning Schemes (continued)

- Holding companies, hybrid entities and hybrid financial instruments
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Basic Tax Planning Schemes (continued)

Employment Income

- Taxation of dependent personal services
- General rules
- International hiring-out of labour
- Directors' fees
- Artistes and sportsmen

Employment Income

Case Study

Anti-Avoidance Rule

- General anti-avoidance rules
- Controlled foreign companies
- Anti-tax haven provisions
- Limitation of benefit provisions

Non-Discrimination and Triangular Case

- Article 24 of the OECD Model
- Triangular cases involving PE and dual resident companies

Introduction to Transfer Pricing

- Significance of transfer pricing
- Legal framework
 - associated enterprises
 - arm's length principle
- Comparability
- Documentation
- Advance pricing agreements
- Latest developments

Introduction to Transfer Pricing (continued)

- Transfer pricing methodologies
 - comparable uncontrolled price
 - cost-plus method
 - resale price method
 - profit split method
 - transactional net margin method
 - other methods
- Case study

Intra-Group Services

- Introduction
- Identification of intra-group services
- Transfer pricing methods
- Service charge computation

Case Study

Dates for this HAYES master class are May 16 – 17, 2018, May 23 – 24, 2018 and May 30 – 31, 2018.

Cost of the seminar is USD 1330 per delegate.

Seminar will take place at Beirut, Lebanon.

Best Regards,

Saffi

Training Specialist

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