

**COURSE : INTERNATIONAL TAXATION**

**LEVEL : LEVEL III**

**SUBJECT : COURSE STRUCTURE**

**COURSE CODE : CITA 303**

### **Course Objective**

The objective of this module is to provide an overview of the main issues that usually considered under the subject discipline of International Taxation. Foreign tax systems of multi – national and national companies are covered including the general concepts like transfer pricing.

### **Course Description**

International Taxation involves cross – border transactions and tax systems of individuals moving from one country to the other. In total, the scope covers general cross – border transactions involving employment Income Tax, Business Income Tax, Investment Income, Capital Gains Tax, Gift Tax, Property Tax, Inheritance Tax and Value Added Tax.

### **COURSE OUTLINE**

Week 1 – 5	Introduction to International Taxation: the Scope of International Taxation, Employment Income Tax under International Taxation, Business Income Tax and investment Income Tax per the OECD model.
Week 6 – 10	Double Taxation and Foreign Tax Credit, International Tax Rates and Sample Computations, Double Taxation Treaties and their application.
Week 11 – 15	Taxation of Trading Income in different tax jurisdictions, Foreign Investment Income Tax, Branch versus Subsidiary Taxes, Assessment of Investment Income, Dividend Income, Bonds, Annuities and other foreign Investments.
Week 16 – 20	Tax Assessment of Holding Companies, Taxation of Foreign exchange gains and losses. The system of Tax Havens E.g. Bahamas, layman Islands, Isle of man, Malta, Swiss, etc. Global Transfer pricing and other Tax considerations.