

**TFC Compliance** 



IMPROVE YOUR KNOWLEDGE IN TAXATION

TRAININGS AND E-LEARNINGS for Corporate and Individual Clients

#### **PURPOSE**

The programme is designed to learn modern tax planning techniques and efficient ways of applying international tax treaties. The course enables staff to predict and assess tax consequences of international transactions and structure foreign trade transactions competently.

## WHO WE CONSULT

- Financial Institutions
- Insurance
- Technology & Innovation
- Hospitality
- Soft Commodities
- Oil & Gas
- Marine
- Healthcare
- Law Firms

#### **OUR CLIENTS**

- International companies;
- Foreign entities operating in UK,
   EU, Asia & Oceania and Eastern
   Europe.

ENCOURAGE STAFF
TRAININGS TO
MANAGE RISKS OF
TAX NON-COMPLIANCE

#### **AUDIENCE**

Executives and professionals working or wishing to work for consulting companies as well as tax departments of domestic and foreign manufactures and trade companies.







OUR ADVANTAGE

## GLOBAL CONTENT

Our training programmes are designed for both organisations operating globally.

The content of programmes can be delivered in any European language.

# INTERNATIONAL EXPERIENCE

Our tax experts share their knowledge and expertise gained through years of experience in European, American, Middle Eastern and Asian companies. This makes our training programmes unique.

## ADAPT TRAININGS FOR YOUR NEEDS

Our training programmes can be tailored to the needs of your organisation. We are ready to work together to design courses which meet your requirements.





#### **OUR PROGRAMMES**

#### **TAX PLANNING**

The course helps to understand peculiarities of unincorporated structures, the construction of asset ownership structures. It covers legal substance requirements for companies, issues related to beneficiaries disclosure with a particular focus on foreign jurisdictions/offshore heavens (at your request).

## INTERNATIONAL TAX TREATIES

The course covers OECD model tax convention which forms the base of the vast majority of existing double tax treaties. The course includes examples of real tax disputes settled by the European Court of Justice and tax precedents resolved by the Supreme Court of Russia.





### TAXATION OF INCOME RECEIVED FROM THE USE AND SALE OF REAL ESTATE & PERSONAL PROPERTY

The course covers taxation of a "passive income". It focuses on the process of tax structuring for various asset flows.

### PERMANENT ESTABLISHMENTS

The course is useful for those wishing to have physical presence in a foreign jurisdiction, in order to enter a new market. The information will be beneficial for those who operate through retailers and online trading platforms.





# TAXATION OF EMPLOYMENT INCOME

The course is for senior executives and members of Board of Directors in various jurisdictions, as well as Russian and foreign professionals working abroad.

## OUTSOURCING AND SECONDMENT

The course covers issues arising out of outsourcing and employees' secondments. It focuses on legal restrictions and tax issues related to outsourcing and secondments.

Myths about what can and cannot be done are being unveiled.



# DEFINITION OF "OTHER INCOMES" UNDER INTERNATIONAL TAX TREATIES

The focus of the course is on the current provisions of the tax treaties, as well as recent changes and practices arising from legal disputes relating to the definition of this type of income.

# LINKS BETWEEN RUSSIAN TRANSFER PRICING AND INTERNATIONAL TAX TREATIES

The course will be useful for those involved in foreign trade activities, related to export and import operations.







**CONTACT US** 

We would be happy to answer any questions you may have.

TFC Tax Partner: Stepan Lyubavskiy

https://tfccompliance.com/ourteam

Contact us:

https://tfccompliance.com/contact-us

