



International Taxation, Foreign Trade and Customs

» Modality: online

» Duration: 12 months.

» Certificate: TECH Global University

» Accreditation: 60 ECTS

» Schedule: at your own pace

» Exams: online

» Intended for:Professionals dedicated to tax advice, accounting or financial advice, both to companies and in-house advisors. Professionals from other financial areas who want to expand their knowledge in international taxation. Other professionals with different specializations who want to get started in the area of international taxation

Website: www.techtitute.com/us/school-of-business/professional-master-degree/master-international-taxation-foreign-trade-customs

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01 **Welcome**

Today, the economic business environment is becoming increasingly globalized. The advance of new technologies has brought about a transformation in economic relations, as well as in foreign trade and customs activities. With the International Taxation, Foreign Trade and Customs program, the professional will acquire a complete international fiscal vision, obtaining a specialized and differentiating knowledge of the commercial and fiscal sector.

This program offers a complete vision of European Tax Law within international taxation, through the study of the basic European institutions involved in the taxintegration process. And it does so with an eminently practical approach that will help the student to obtain the fundamentals and knowledge necessary to face the casuistry that can be found in the day to day, as well as to understand the weight and visas of different stakeholders in various tax planning strategies.









tech 08 | Why Study at TECH?

At TECH Global University



Innovation

The university offers an online learning model that balances the latest educational technology with the most rigorous teaching methods. A unique method with the highest international recognition that will provide students with the keys to develop in a rapidly-evolving world, where innovation must be every entrepreneur's focus.

"Microsoft Europe Success Story", for integrating the innovative, interactive multi-video system.



The Highest Standards

Admissions criteria at TECH are not economic. Students don't need to make a large investment to study at this university. However, in order to obtain a qualification from TECH, the student's intelligence and ability will be tested to their limits. The institution's academic standards are exceptionally high...

95%

of TECH students successfully complete their studies



Networking

Professionals from countries all over the world attend TECH, allowing students to establish a large network of contacts that may prove useful to them in the future.

+100000

+200

executives prepared each year

different nationalities



Empowerment

Students will grow hand in hand with the best companies and highly regarded and influential professionals. TECH has developed strategic partnerships and a valuable network of contacts with major economic players in 7 continents.

+500

collaborative agreements with leading companies



Talent

This program is a unique initiative to allow students to showcase their talent in the business world. An opportunity that will allow them to voice their concerns and share their business vision.

After completing this program, TECH helps students show the world their talent.



Multicultural Context

While studying at TECH, students will enjoy a unique experience. Study in a multicultural context. In a program with a global vision, through which students can learn about the operating methods in different parts of the world, and gather the latest information that best adapts to their business idea.

TECH students represent more than 200 different nationalities.



Learn with the best

In the classroom, TECH's teaching staff discuss how they have achieved success in their companies, working in a real, lively, and dynamic context. Teachers who are fully committed to offering a quality specialization that will allow students to advance in their career and stand out in the business world.

Teachers representing 20 different nationalities.



At TECH, you will have access to the most rigorous and up-to-date case analyses in academia"

Why Study at TECH? | 09 tech

TECH strives for excellence and, to this end, boasts a series of characteristics that make this university unique:



Analysis

TECH explores the student's critical side, their ability to question things, their problem-solving skills, as well as their interpersonal skills.



Academic Excellence

TECH offers students the best online learning methodology. The university combines the Relearning method (postgraduate learning methodology with the best international valuation) with the Case Study. Tradition and vanguard in a difficult balance, and in the context of the most demanding educational itinerary.



Economy of Scale

TECH is the world's largest online university. It currently boasts a portfolio of more than 10,000 university postgraduate programs. And in today's new economy, **volume + technology = a ground-breaking price**. This way, TECH ensures that studying is not as expensive for students as it would be at another university.





tech 12 | Why Our Program?

This program will provide you with a multitude of professional and personal advantages, among which we highlight the following:



A Strong Boost to Your Career

By studying at TECH, students will be able to take control of their future and develop their full potential. By completing this program, students will acquire the skills required to make a positive change in their career in a short period of time.

70% of students achieve positive career development in less than 2 years.



Develop a strategic and global vision of the company

TECH offers an in-depth overview of general management to understand how each decision affects each of the company's different functional fields.

Our global vision of companies will improve your strategic vision.



Consolidate the student's senior management skills

Studying at TECH means opening the doors to a wide range of professional opportunities for students to position themselves as senior executives, with a broad vision of the international environment.

You will work on more than 100 real senior management cases.



You will take on new responsibilities

The program will cover the latest trends, advances and strategies, so that students can carry out their professional work in a changing environment.

45% of graduates are promoted internally.



Access to a powerful network of contacts

TECH connects its students to maximize opportunities. Students with the same concerns and desire to grow. Therefore, partnerships, customers or suppliers can be shared.

You will find a network of contacts that will be instrumental for professional development.



Thoroughly develop business projects.

Students will acquire a deep strategic vision that will help them develop their own project, taking into account the different fields in companies.

20% of our students develop their own business idea.



Improve soft skills and management skills

TECH helps students apply and develop the knowledge they have acquired, while improving their interpersonal skills in order to become leaders who make a difference.

Improve your communication and leadership skills and enhance your career.



You will be part of an exclusive community

Students will be part of a community of elite executives, large companies, renowned institutions, and qualified teachers from the most prestigious universities in the world: the TECH Global University community.

We give you the opportunity to study with a team of world-renowned teachers.





tech 16 | Objectives

TECH makes the goals of their students their own goals too Working together to achieve them

The Executive Master's Degree in International Taxation, Foreign Trade and Customs will enable students to:



Acquire a complete International Tax vision in both direct and indirect taxation



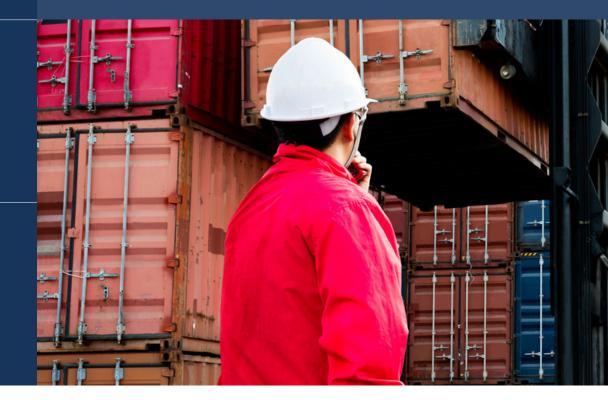
Provide the basic knowledge that serves as a basis and foundation to understanding international taxation and to developing as a specialized professional



Know the impact that different international organizations, such as the OECD, have on the subject, and the pressure on countries to adapt to the measures put forward by these organizations



Understand the importance of existing International Tax strategies in order to apply them in daily practice





Know and understand the process of Fiscal integration in the European Union through the study of the basic pillars and objectives that govern European Fiscal Policy



Have a clear view of the progression and implementation of BEPS in the most relevant countries





Identify opportunities for international tax strategies in multinational groups



Know the rules and regulations applicable to economic relations between non-resident entities and Spanish entities











Identify related-party transactions, know how to perform a functional analysis and the available methodologies for valuing transactions



Identify opportunities for international tax strategies in multinational groups



Understand the OECD's role in double taxation and its significance in the regulation of international relations





Delve into the main aspects of double taxation treaties: persons and taxes covered, residence criteria, main income and methods to avoid double taxation



Have a clear vision of the key aspects to be analyzed in corporate reorganizations, both domestic and cross-border



Delve deeper into the taxation impact the non-resident entities' activities and economic relations have in Spain



Identify the Tax differences that apply to residents of the European Union as compared to residents of third countries





Understand the objectives pursued by the Fiscal Integration Process in the European Union and its practical implications among each one of its member states



Identify the main consequences derived from transactions involving real estate assets by non-residents



Understand the relevance of European Tax Law in International Tax structuring



Understand the fundamental operation of manufacturing excise taxes, both in the application of the suspension regime and in the realization of taxable transactions



Apply tax regulations, taking into account the employee's country of origin and country of posting, as well as international double taxation treaties



Provide an overview of the international tax issues that may affect a company



Understand the arm's length principle, the international issues arising from related-party transactions and the alliance between administrations





Provide assistance on the guidelines or criteria that can be followed in the design of an International Tax Planning Strategy based on the different regulations in different countries



Understand the main requirements and benefits of the different holding regimes around the world in view of their practical application





Understand the rationale for free trade zones and the requirements and benefits of their use by corporations



Be familiar with the most relevant and innovative Spanish jurisprudence on the subject





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Syllabus

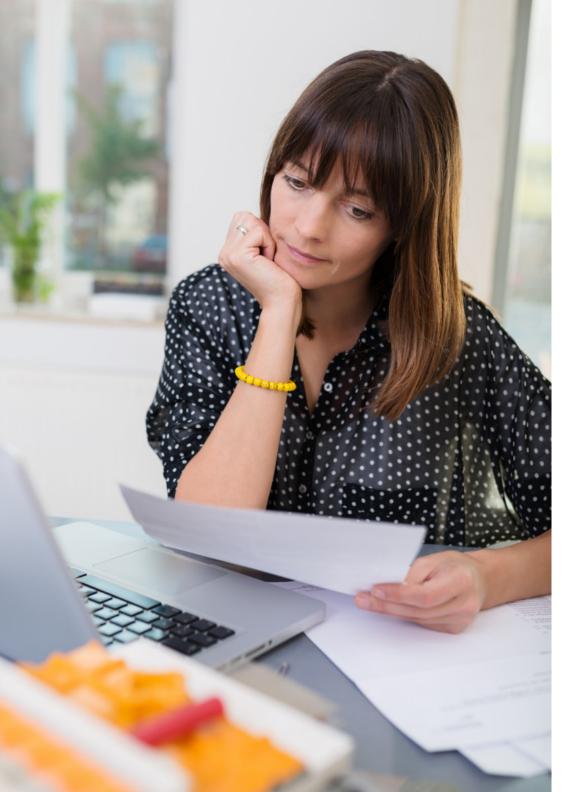
The Professional Master's Degree in International Taxation, Foreign Trade and Customs of TECH Global University is an intense program that prepares professionals to face challenges and business decisions globally. Its content is designed to promote the development of skills that enable more rigorous decision making in uncertain environments.

Over 1,800 hours, students will analyze a multitude of practical cases through individual work, thereby achieving a profound understanding that they can transfer to their daily professional practice. It is, therefore, a genuine immersion in real scenarios that will help them to deal with complex situations in their daily practice.

A plan designed for the student, focused on improving their career and preparing them to achieve professional excellence. A program that understands your needs and those of your company through innovative content based on the latest trends, and supported by the best educational methodology and an exceptional faculty, which will provide you with the skills to solve critical situations in a creative and efficient way.

This project is developed over 12 months and is divided into 10 modules:

Module 1	Basic Principles of International Taxation and Non-Resident Income Tax
Module 2	Indirect Taxation on Foreign Trade
Module 3	Double Taxation Treaties
Module 4	BEPS Project and Anti-Abuse Measures
Module 5	International Taxation Strategies and Special Regimes in Spain
Module 6	International Taxation Strategies and Comparative Regimes
Module 7	Expatriates and Individual Planning
Module 8	Transfer Pricing
Module 9	Customs
Module 10	Indirect Taxation on Foreign Trade



Where, When and How is it Taught?

TECH offers the possibility of studying this Executive Master's Degree in In International Taxation, Foreign Trade and Customs completely online. Throughout the 12 months of the educational program, the students will be able to access all the contents of this program at any time, allowing them to self-manage their study time.

A unique, key, and decisive educational experience to boost your professional development and make the definitive leap.

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Module 1. Basic Principles of International Taxation

1.1. Basic Principles of International Taxation

- 1.1.1. Introduction to International Taxation
- 1.1.2. Residence Principle vs. Source
- 1.1.3. International Double Taxation, Concepts, Types and Solutions

1.2. Description of Methods to Avoid Double Taxation

- 1.2.1. Introduction
- 1.2.2. Exemption Method
- 1.2.3. Imputation Method
- 1.2.4. Methods to Avoid Double Taxation under Spanish Law

1.3. Nature, Purpose and Scope of Non-Resident Income Tax Application. Personal Elements of Non-Resident Income Tax

- 1.3.1. Introduction. Nature, Purpose and Scope of Non-Resident Income Tax Application
- 1.3.2. Non-Resident Income Taxpayers and Persons Liable for Non-Resident Income Tax
- 1.3.3. Residence
- 1.3.4. Representatives

1.4. General Non-Resident Income Tax Rules

- 1.4.1. Tax Liability. Taxable Event
- 1.4.2. Income Obtained in Spanish Territory Article 13 LIRNR
- 1.4.3. Exempt Income Article 14 LIRNR

1.5. Non-resident Taxation Without Permanent Establishment

- 1.5.1. Taxable Income. Composition and Specific Rules
- 1.5.2. Tax Rate. Applicable Tax Rates
- 1.5.3. Tax Accrual and Declaration
- 1.5.4. Calculation of Tax Debt
- 1.5.5. Permanent Establishment Diversity. Tax Period and Accrual

1.6. Non-resident Taxation With Permanent Establishment

- 1.6.1. Income Attributable to the Permanent Establishment and Determination of the Tax Base
- 1.6.2. Calculation of Tax Debt
- 1.6.3. Permanent Establishment Diversity. Tax Period and Accrual

1.7. Real Estate Taxation

- 1.7.1. Concept of *Real Estate* in Spanish Law and in Double Taxation Treaties
- 1.7.2. Taxation of Capital Gains Obtained Though Real Estate Sales. Activos Mobiliarios vs. Movable Assets vs.
- 1.7.3. Taxation of Real Estate Income
- 1.7.4. Special Tax on Real Estate Assets of Nonresident Entities

1.8. Entities under the Income Attribution Regime (ERAR)

- 1.8.1. Introduction to Entities under the Income Attribution Regime
- 1.8.2. Entities under the Income Attribution Regime Incorporated in Spain, Taxation of Nonresident Members
- 1.8.3. Entities under the Income Attribution Regime Incorporated Abroad

1.9. Non-European Union Resident vs. RoW

- 1.9.1. Dividends, Interest, Royalties, Capital Gains
- 1.9.2. Taxable Income. Rules Applicable to EU Residents
- 1.9.3. Applicable Tax Rate

1.10. Formal Obligations

- 1.10.1. Account Withholdings and Payments
- 1.10.2. Declaration Rules for Non-Residents without PE and with PE
- 1.10.3. Certificates of Residence
- 1.10.3. Other Obligations of Non-Residents Obtaining a Taxpayer Identification Number

(NIF), inclusion in the Enabled Electronic Address (DEH)

Mod	Module 2. Indirect Taxation on Foreign Trade								
2.1.2. 2.1.3.	Law Introduction		The Parent-Subsidiary Directive Introduction Main Features Content Application Requirements The Parent-Subsidiary Directive and Tax Evasion: Abuse of European Law and Anti-abuse Clauses Transposition in Spain	2.3. 2.3.1. 2.3.2. 2.3.3. 2.3.4. 2.3.5.	The Interest and Royalties Directive Introduction Main Features Application Requirements The Interest and Royalties Directive and Tax Evasion: Abuse of European Law and Antiabuse Clauses Transposition in Spain	2.4.1. 2.4.2. 2.4.3. 2.4.4. 2.4.5.	Restructuring Cases Covered by the Directive		
2.5.1. 2.5.2. 2.5.3. 2.5.4. 2.5.5.	Anti-circumvention Directives I (ATAD I) Introduction Main Features Areas Anti-Tax Avoidance Clauses in the Directive Transposition in Spain	2.6.1. 2.6.2. 2.6.3. 2.6.4. 2.6.5.		2.7. 2.7.1. 2.7.2. 2.7.3. 2.7.4.	State Aid and Taxation Introduction General Aspects Concurrence Requirements Nature of State Aid	2.8. 2.8.1. 2.8.2. 2.8.3.	Administrative Cooperation Introduction General Aspects The Directive on Administrative Cooperation		
2.9. 2.9.1. 2.9.2. 2.9.3. 2.9.4. 2.9.5. 2.9.6.	General Aspects Areas Contents and Definitions Transitional Period	2.10.1	The Role of the Court of Justice of the European Union Introduction Preliminary Ruling Main CJEU Rulings						

Module 3. Double Taxation Treaties 3.1. Different Models of Double 3.2. Basic Concepts of Commentaries 3.3. Articles 1 to 4 - OECD Model Tax 3.4. Article 5: Permanent to the OECD Model Establishments - OECD Model Tax **Taxation Avoidance Treaties** Convention and Exchange of Information Convention 3.2.1. Introduction to Commentaries to the OECD 3.3.1. Persons and Taxes Covered 3.3.2. General Definitions Agreements 3.4.1. Concept of PE 3.2.2. The Role of Commentaries to the OECD 3.3.3. Residence 3.4.2. Fixed Place of Business 3.1.1. Introduction to Double Taxation Treaties. 3.4.3. Dependent Agent vs. Independent Agent Evolution of Double Taxation Treaties Over Time 3.2.3. Reservations on Commentaries to the OECD 3.4.4. Impact of BEPS on Article 5 3.1.2. Different Double Taxation Treaties Models. Model OCDE vs. UN vs. U.S.A UU 3.1.3. Information Exchange Agreements 3.5. Article 7: Business Benefits - OECD 3.6. Article 10 and 11 - Dividends 3.7. Article 12: Royalties - OECD Model 3.8. Article 13: Capital Gains - OECD Model Tax Convention and Interest - OECD Model Tax Convention-Fees Model Tax Convention Convention 3.7.1. Concept of Royalties 3.5.1. Concept of Corporate Profit 3.8.1. Concept of Capital Gains 3.5.2. Obtaining Business Profits by a Permanent 3.7.2. Treatment of Technical Assistance and Other 3.8.2. Taxation of Capital Gains 3.6.1. Concept of Dividends Establishment Related Services 3.8.3. Corporate Reorganization Clauses 3.6.2. Taxation of Dividends Taxation of Permanent Establishment 3.7.3. Taxation of Royalties 3.6.3. Concept of Interest 3.6.4. Taxation of Interest 3.5.4. Deductibility of Expenses for a Permanent Establishment 3.9. Exemption and Taxation Methods in 3.10. Benefit Limitation Clauses and the OECD Model Convention Other Clauses in the OECD Model Convention 3.9.1. Exemption Method 3.9.2. Imputation Method 3.10.1. Introduction to Benefit Limitation Clauses 3.9.3. Tax Sparing Clause 3.10.2. LOB Clause - ML Proposal 3.10.3. Principle Purpose Test 3.10.4. Most Favored Nation Clause

Module 4. BEPS Project and Anti-Abuse Measures

4.1. BEPS Project

- 4.1.1. Origin and Introduction to the BEPS Project
- 4.1.2. Action Plan Description
- 4.1.3. Implementation by Country and Difficulties
- 4.1.4. What is next?

4.2. Digital Economy Issues

- 4.2.1. Concept of Digital Economy
- 4.2.2. How Does BEPS Impact the Digital Economy?
- 4.2.3. Implementation by Country and Difficulties
- 4.2.4. What is next?

4.3. Hybrid Instruments

- 4.3.1. Concept of Hybrid Instruments
- 4.3.2. How Does BEPS Impact the Hybrid Instruments?
- 4.3.3. Implementation by Country and Difficulties.
- 4.3.4. What Is Next?

4.4. Hybrids in Spain and Anti-hybrids in Spain

- 4.4.1. Impact of BEPS on Spanish Tax Legislation
- 4.4.2. Anti-hybrid Measures in Corporate Income Taxes
- 4.4.3. Difficulties Arising from Anti-Hybrid Measures in Corporate Income Tax.

4.5. Interest Deductibility

- 4.5.1. Tax Issues Associated with Interest Deductibility
- 4.5.2. How Does BEPS Impact Interest Deduction?
- 4.5.3. Implementation by Country and Difficulties
- 4.5.4. What Is Next?

4.6. Deductibility of Interest in Spain

- 4.6.1. Understanding the Evolution of Interest Deductibility in Spain
- 4.6.2. Impact of BEPS and ATAD on Spanish Tax Legislation
- 4.6.3. Limitation on the Interest Deduction for Corporate Income Tax Purposes

4.7. Other Anti-abuse Measures

- 4.7.1. General Anti Avoidance Rule (GAAR)
 Concept
- 4.7.2. Definition and Examples of Specific Anti-Abuse Clauses in Spain
- 4.7.3. Introduction to Tax Havens
- 4.7.4. Impact of Operations with Tax Havens in Spain

4.8. Multilateral Instrument (MLI)

- 4.8.1. Introduction to the Multilateral Instrument
- 4.8.2. Impact of the MLI on Double Taxation Avoidance Treaties
- 4.8.3. Implementation by Country
- 4.8.4. What is Next?

4.9. Other OECD Actions in the Area of International Taxation

- 4.9.1. Transparency and Exchange of Information for Tax Purposes
- 4.9.2. Mutual Administrative Assistance in Tax
- 4.9.3. Automatic Exchange of Information

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Mod	Module 5. International Taxation Strategies and Special Regimes in Spain								
5.1. 5.1.1. 5.1.2. 5.1.3.	Introduction to International Tax Planning Introduction Relevant Aspects of Tax Planning Tax Planning Instruments	5.2. 5.2.1. 5.2.2. 5.2.3.	Outbound Structures Introduction to Outbound Structures Relevant Aspects to Be Considered in Outbound from Spain Practical Example	5.3. 5.3.1. 5.3.2. 5.3.3.	Inbound Structures Introduction to Inbound Structures Relevant Aspects to be Taken into Account in Inbound within Spain Practical Example	5.4.1. 5.4.2.	Corporate Reorganizations of Multinational Groups Types of Business Reorganizations Relevant Aspects to Consider Capital Gains and Real Estate Holding Taxation		
5.5.	Corporate Reorganizations of Multinational Groups	5.6.	Neutrality in Internal Reorganizations in Spain	5.7.	Neutrality in Cross-border Reorganizations	5.8. 5.8.1.	Transparent Entities Definition of Transparent Entity		
5.5.1. 5.5.2. 5.5.3.	Limitations on the Use of Tax Losses Limitations on the Use of Tax credits	5.6.2. 5.6.3.	Understanding the Types of Reorganization Transactions	5.7.1. 5.7.2. 5.7.3. 5.7.4.	Understanding the Types of Reorganization Transactions Potential Tax Implications in Spain Introduction to the Neutrality Regime in Spain Practical Example	5.8.3.	Practical Examples of Transparent Entities in Other Jurisdictions Concept of Entity Under the Income Attribution Regime (ERAR) in Spain Methodology for Income Integration and Formalities		
5.9. 5.9.1. 5.9.2. 5.9.3.	Spanish Real Estate Investment Trusts (REITs) Introduction to Real Estate Investment Trusts Main Requirements Main Tax Implications	5.10.1 5.10.2	Problems Arising from International Tax Strategies Introduction to Business Model Changes Main Objectives of These Changes Cases in Spanish Jurisprudence						

.,,,,,,	ule 6. International Taxation Strategies		,				
6.1. 6.1.1. 6.1.2.	Comparative Holding Regimes Main Aspects to Consider Main Holding Regimes Worldwide	6.2.6.2.1.6.2.2.6.2.3.6.2.4.	ETVE Regime Understanding and Requirements; Practical Vision Implications for the Holding Company Tax Implications for Shareholders Various Formalities	6.3. 6.3.1. 6.3.2. 6.3.3.	Free Trade Zone Regimes Understanding the Free Trade Zone Main Tax Benefits Examples of Free Trade Zone Regimes	6.4. 6.4.1. 6.4.2. 6.4.3. 6.4.4.	Canary Islands Special Zone Introduction to the Canary Islands Special Zone Investment Requirements and Permitted Activities Tax Benefits Examples and Real Cases
6.5. 6.5.1. 6.5.2.	Territorial Regimes How Territorial Regimes Work Main Territorial Regimes Worldwide	6.6. 6.6.1. 6.6.2. 6.6.3.	Patent Box Definition and Understanding of Patent Box Evolution of the Patent Box Comparison of the Main Regimes of Patent Box		Trust and Fiduciary Introduction to the concept of <i>Trust</i> Impact in Spain Practical Example	6.8.1. 6.8.2. 6.8.3.	Principles of International Taxation in the United States (I) Types of Entities from a Federal Fiscal Standpoint: Partnership, Disregarded Entities, etc. Main Federal Tax Impact by Entity Type Practical Example With Spain
6.9. 6.9.1. 6.9.2. 6.9.3.	Principles of International Taxation in the United States (II) How the United States Tax System Works UU Introduction to United States Tax Reform UU		Public Reaction to International Taxation Strategies Influence of the International Press on International Taxation				

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Module 7. Expatriates and Individual Planning							
7.1.	Principles of Fiscal Residency. Domestic Law and Double Taxation Treaties	7.2.	Resident Taxation. Main Tax Obligations	7.3.	Non-resident Taxation. Main Tax Obligations	7.4.	Main Taxation Regimes in Spain and Others
7.1.1. 7.1.2. 7.1.3. 7.1.4.	Residency in Double Taxation Treaties. Double Taxation Treaties Art. 4 Residency Conflicts	7.2.1. 7.2.2. 7.2.3. 7.2.4.	General Considerations Tax Implications. Definition of Yields Employer Tax Obligations Double Taxation Treaties Arts. 14 and 15	7.3.1. 7.3.2. 7.3.3.	General Considerations Tax Implications. Definition of Yields Employer Tax Obligations	7.4.2.	General Considerations Main Special Taxation Regimes: Spain, Europe (Italy, France, The Netherlands), Latin America Accreditation of Tax Residency Issues
7.5. 7.5.1. 7.5.2. 7.5.3.	Typology of Expatriations	7.6. 7.6.1. 7.6.2. 7.6.3.	Expatriate Compensation Package. Main Supplements and Benefits Economic Conditions Supplements and Benefits Practical Aspects of International Mobility Compensation Management	7.7. 7.7.1. 7.7.2. 7.7.3.	International Expatriation Policies. Practical Aspects. Objective of an Expatriation Policy Compensation and Benefits Assignment Process	7.8. 7.8.1. 7.8.2. 7.8.3.	Remuneration Policies Fiscal Equalization Tax Protection Laissez-Faire
7.9.	General Considerations United States Mexico, Brazil, China, Spain	7.10.	Other Related Issues: Labor Immigration and Social Security				
7.9.1. 7.9.2. 7.9.3. 7.9.4.	Taxation in Brazil	7.10.2	Migratory Aspects Labor Aspects Social Security Aspects				

8.1.	Introduction to the Arm's Length Principle	8.2.	Spanish Transfer Pricing Legislation	8.3.	How to Document Related-party Transactions (BEPs - Action 13)	8.4.	Introduction to the Valuation of Related-party Transactions
	Introduction to the OECD Guidelines Introduction to the European Transfer Pricing Forum BEPs Plan and its Transfer Pricing Actions	8.2.1. 8.2.2. 8.2.3.	Engagement Principles Introduction to Transfer Pricing Methods Introduction to Intragroup Services	8.3.1. 8.3.2. 8.3.3.	Functional Analysis Determinant Factors for Comparability Search for Comparables	8.4.2.	How to Identify and Group Transactions? Financial Segmentations When There are Multiple Functions in the Entity Model 232
8.5.3.	Valuation Methods Comparable Uncontrolled Price (CUP)- Theoretical-Practical Incremental Cost and Resale Price- Theoretical-Practical Profit Split-Theoretical-Practical Transactional Net Margin Method (TNMM)- Theoretical-Practical	8.6. 8.6.1. 8.6.2. 8.6.3.	Special Considerations in Intragroup Services (BEPs Action 10) Identification of the Services that Generate Benefits. Case Study: Interviews Determination of the Intragroup Charge How to Distribute the Position Among the Subsidiaries?	8.7.1 8.7.2 8.7.3.	Operations Determination of Interest Rates. Level of Debt Introduction to Cash Pooling: Mechanism	8.8. 8.8.1. 8.8.2. 8.8.3.	Special Considerations Definition of an Intangible Asset Transfer of Intangibles: Alternatives Legal Ownership vs. Economic Ownership
8.9. 8.9.1. 8.9.2. 8.9.3.	Introduction to Advance Pricing Arrangement (APA). Unilateral, Bilateral and Multilateral Procedures Which are the Most Frequent Operations for Requesting an APA? How and When? Advantages and Disadvantages Practical Case	8.10.1 8.10.2	PT Inspections: Hot Topics How to Prepare for a Potential Inspection? Relationship and Interaction with the Group Friendly Settlement Procedures from Arbitration and Multilateral Instruments				

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9.1. 9.1.1. 9.1.2. 9.1.3.		9.2. 9.2.1. 9.2.2. 9.2.3.	Elements on Which the Application of Import or Export Duties is Based Common Customs Tariff and Tariff Classification of Goods Determination of the Origin of Goods Preferential and Non-preferential Origin	9.3. 9.3.1. 9.3.2. 9.3.3.	Customs Value of Goods Customs Valuation Methods Transaction Value Elements to be Included and Excluded When Determining the Customs Value by Means of Transaction Value	9.4. 9.4.1. 9.4.2. 9.4.3.	Guarantee for a Customs Debt
9.5.1. 9.5.2. 9.5.3. 9.5.4.	Inclusion of Goods in a Customs Statute Customs Status of Goods Placing Goods Under a Customs Procedure Checking and Release of Goods Disposition of Goods	9.6.1. 9.6.2. 9.6.3.	Release for Free Circulation and Import Duty Exemption Inbound Goods Release for Free Circulation Import Duty Exemption	9.7. 9.7.1. 9.7.2. 9.7.3. 9.7.4.	Special Regimes I General Provisions Transit Deposit Free Zones	9.8.2.	Special Regimes II Temporary Importation Final Destination Improvement
9.9. 9.9.1. 9.9.2. 9.9.3.	Exit of Goods from the Customs Territory of the Union Formalities at Departure of Goods Export and Outbound Declaration Single Administrative Document	9.10.1 9.10.2 9.10.3	Relevant Issues in Customs Practice Incoterms Trade Defence Measures Customs Representation Authorized Economic Operator				

10.1. General Aspects 10.1.1. Foreign Trade Taxes 10.1.2. The Purpose of Different Levies 10.1.3. Tax Adjustments on the Border 10.1.4. Single Market	 10.2. Introduction 10.2.1. Overview 10.2.2. Single Market and Harmonization in the European Union 10.2.3. Territory of IGIC (Canary General Indirect Tax) and IPSI (Tax on Production, Services and Imports) Tax Application 	10.3. Intra-Community Deliveries and Transactions10.3.1. Place of Performance10.3.2. Passive Entity10.3.3. Applicable Exemptions	 10.4. Intra-Community Acquisition and Transactions 10.4.1. Place of Performance, Accrual, Taxable Income and Passive Entity 10.4.2. Applicable Exemptions 10.4.3. Intra-Community Transportation of Goods
10.5. Individual Regimes 10.5.1. Non-subjection to Taxation of Intra-Community Acquisition of Goods by Certain Persons 10.5.2. New Means of Transportation 10.5.3. Remote Sales	 10.6. Exportation and Transactions 10.6.1. Export Exemption 10.6.2. Exemptions for Transactions Treated as Exports 10.6.3. Exemptions in Exempt Areas and Suspension Regimes 	10.7. Imports and Similar Transactions I 10.7.1. Taxable Event 10.7.2. Accrual 10.7.3. Taxable Income	10.8. Imports and Similar Transactions II 10.8.1. Passive Entity 10.8.2. Income Tax Authorities 10.8.3. Exemptions
 10.9. Common Features of Excise Duties I 10.9.1. General Aspects and Harmonization in the European Union 10.9.2. Excise Duties in Spain and Their Scope of Application 10.9.3. Taxable Transaction and Non-Liability Cases 	 10.10. Elements Common to Excise Taxes II 10.10.1. Taxable Income, Passive Subject, Exemptions and Refunds 10.10.2. Suspension Regime and Tax Impact 10.10.3. Formal Obligations 		



This academic program offers students a different way of learning. Our methodology uses a cyclical learning approach: **Relearning.**

This teaching system is used, for example, in the most prestigious medical schools in the world, and major publications such as the **New England Journal of Medicine** have considered it to be one of the most effective.





tech 42 | Methodology

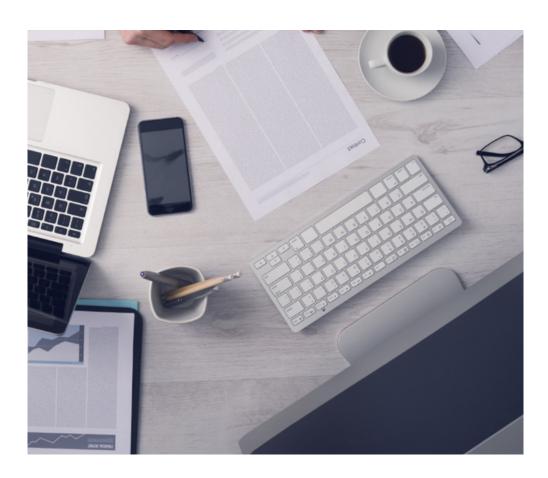
TECH Business School uses the Case Study to contextualize all content

Our program offers a revolutionary approach to developing skills and knowledge. Our goal is to strengthen skills in a changing, competitive, and highly demanding environment.





This program prepares you to face business challenges in uncertain environments and achieve business success.



Our program prepares you to face new challenges in uncertain environments and achieve success in your career.

A learning method that is different and innovative

This TECH program is an intensive educational program, created from scratch to present executives with challenges and business decisions at the highest level, whether at the national or international level. This methodology promotes personal and professional growth, representing a significant step towards success. The case method, a technique that lays the foundation for this content, ensures that the most current economic, social and business reality is taken into account.



You will learn, through collaborative activities and real cases, how to solve complex situations in real business environments"

The case method has been the most widely used learning system among the world's leading business schools for as long as they have existed. The case method was developed in 1912 so that law students would not only learn the law based on theoretical content. It consisted of presenting students with real-life, complex situations for them to make informed decisions and value judgments on how to resolve them. In 1924, Harvard adopted it as a standard teaching method.

What should a professional do in a given situation? This is the question we face in the case method, an action-oriented learning method. Throughout the program, the studies will be presented with multiple real cases. They must integrate all their knowledge, research, argue and defend their ideas and decisions.

tech 44 | Methodology

Relearning Methodology

TECH effectively combines the Case Study methodology with a 100% online learning system based on repetition, which combines different teaching elements in each lesson.

We enhance the Case Study with the best 100% online teaching method: Relearning.

Our online system will allow you to organize your time and learning pace, adapting it to your schedule. You will be able to access the contents from any device with an internet connection.

At TECH you will learn using a cutting-edge methodology designed to train the executives of the future. This method, at the forefront of international teaching, is called Relearning.

Our online business school is the only one in the world licensed to incorporate this successful method. In 2019, we managed to improve our students' overall satisfaction levels (teaching quality, quality of materials, course structure, objectives...) based on the best online university indicators.



Methodology | 45 tech

In our program, learning is not a linear process, but rather a spiral (learn, unlearn, forget, and re-learn). Therefore, we combine each of these elements concentrically. With this methodology we have trained more than 650,000 university graduates with unprecedented success in fields as diverse as biochemistry, genetics, surgery, international law, management skills, sports science, philosophy, law, engineering, journalism, history, markets, and financial instruments. All this in a highly demanding environment, where the students have a strong socio-economic profile and an average age of 43.5 years.

Relearning will allow you to learn with less effort and better performance, involving you more in your specialization, developing a critical mindset, defending arguments, and contrasting opinions: a direct equation to success.

From the latest scientific evidence in the field of neuroscience, not only do we know how to organize information, ideas, images and memories, but we know that the place and context where we have learned something is fundamental for us to be able to remember it and store it in the hippocampus, to retain it in our long-term memory.

In this way, and in what is called neurocognitive context-dependent e-learning, the different elements in our program are connected to the context where the individual carries out their professional activity.

tech 46 | Methodology

This program offers the best educational material, prepared with professionals in mind:



Study Material

All teaching material is produced by the specialists who teach the course, specifically for the course, so that the teaching content is highly specific and precise.

These contents are then applied to the audiovisual format, to create the TECH online working method. All this, with the latest techniques that offer high quality pieces in each and every one of the materials that are made available to the student.



Classes

There is scientific evidence suggesting that observing third-party experts can be useful.

Learning from an Expert strengthens knowledge and memory, and generates confidence in future difficult decisions.



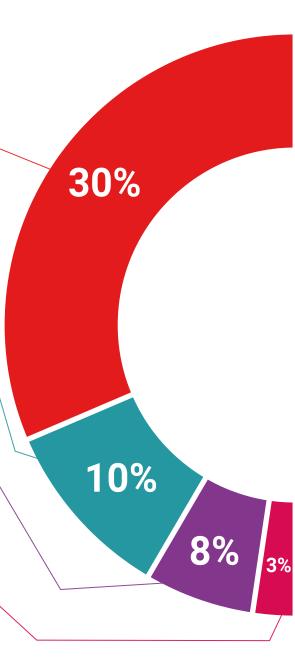
Management Skills Exercises

They will carry out activities to develop specific executive competencies in each thematic area. Practices and dynamics to acquire and develop the skills and abilities that a high-level manager needs to develop in the context of the globalization we live in.



Additional Reading

Recent articles, consensus documents and international guidelines, among others. In TECH's virtual library, students will have access to everything they need to complete their course.





Students will complete a selection of the best case studies chosen specifically for this program. Cases that are presented, analyzed, and supervised by the best senior management specialists in the world.



Interactive Summaries

The TECH team presents the contents attractively and dynamically in multimedia lessons that include audio, videos, images, diagrams, and concept maps in order to reinforce knowledge.

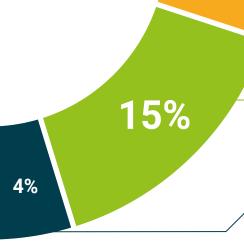


This exclusive educational system for presenting multimedia content was awarded by Microsoft as a "European Success Story".

Testing & Retesting

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We periodically evaluate and re-evaluate students' knowledge throughout the program, through assessment and self-assessment activities and exercises, so that they can see how they are achieving their goals.

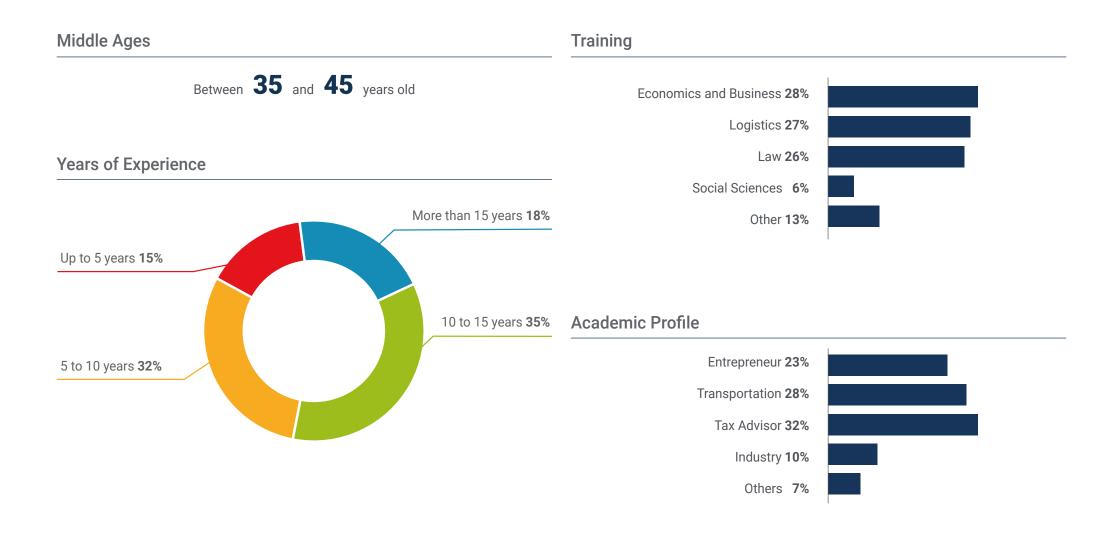


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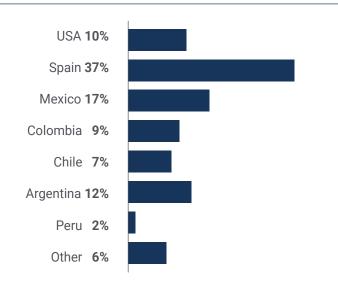




tech 50 | Our Students' Profiles



Geographical Distribution



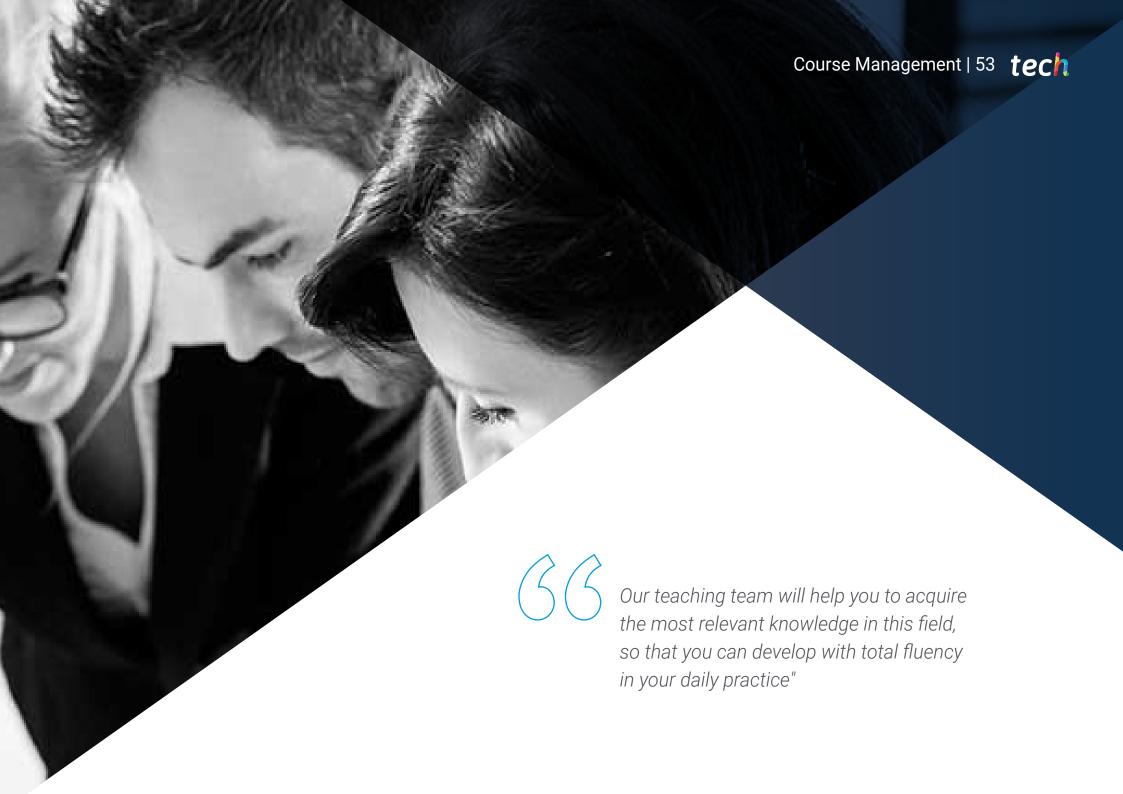


Mónica Pérez

Director of the Tax Department

"Specializing in International Taxation, Foreign Trade and Customs has been a great benefit to my career path. I had been working as a tax advisor in this field for some time, but since I took this program, I got the promotion I had wanted for years. An accomplishment I have achieved thanks to TECH and its high-quality program"





Management



Mr. López Gómez, Alberto

- Lawyer and tax advisor
- Consulting partner and tax lawyer. EJASO ETL GLOBAL Firm. La Coruña
- Partner Director, A&J International Law Firm, A Coruña, Madrid and Lisbon
- Chairman of the Audit Committee and Director of Greenalia La Coruña
- Hijos de Rivera, S.L Corporation. Holding Grupo Estrella Galicia. La Coruña
- Author of publications in national journals and collective works.
- Associate Professor of Tax Law. UdC
- Director Tax LLM. School of Finance
- Degree in Law. University of La Coruña
- Master's Degree in Business Consulting Taxation by IE. Cum laude
- Diploma in Business Management and Administration UdC
- International Taxation Training. IBFD. Amsterdam
- Honored as Lawyer of the Year by Best Lawyers 2022
- Member of: Madrid Bar Association, International Fiscal Association (IFA), Jorge Jove Foundation

Professors

Ms. Valente, Maryline

- Specialist Lawyer in Tax Management
- Lawyer specialized in Tax Law at MGRA Attorneys at Law
- Law Degree from the University of Lisbon
- Post-Graduation in Tax Management at the Lisbon School of Economics & Management
- Postgraduate course in International Taxation at the University of Santiago de Compostela

Dr. Patón García, Gemma

- Expert in Financial and Tax Law
- Professor of Financial and Tax Law
- Fical Section Coordinator at Editorial Bosch
- Substitute Judge in the Courts of Ciudad Real
- Doctor in Financial and Tax Law from the University of Castilla-La Mancha

Mr. Gallego González, Raúl

- Associate tax lawyer at Deloitte Legal
- Tax lawyer in EJASO ETL Global
- Tax consultant at A&J International
- Lawyer at the Tax Department of Juan Capellá Auditores SLP
- Law Degree from the University of Santiago de Compostela
- Master's Degree in Taxation and Fiscal Law from the Association of Economists of La Coruña
- Master's Degree in Finance from the University of Santiago de Compostela
- Master's Degree in Access to the Legal Profession from the Nebrija University

Mr. González Collazo, Hugo

- Director of the Customs and International Trade Area at Ernst & Young Abogados
- Tax department lawyer at Baker & McKenzie. Indirect taxation specialist
- Member of the customs and international trade group of EY Global
- Law Degree from the University of Vigo
- Master's Degree in Law from Pompeu Fabra University

Dr. García Heredia, Alejandro

- Legislative advisor for public and private customs companies
- Professor of Financial and Tax Law at the University of Cadiz
- Doctor of Law, International and European Union Taxation, University of Oviedo
- Master's Degree in Customs Management and Foreign Trade from the University of Cadiz

Mr. Ovando, Juan Manuel

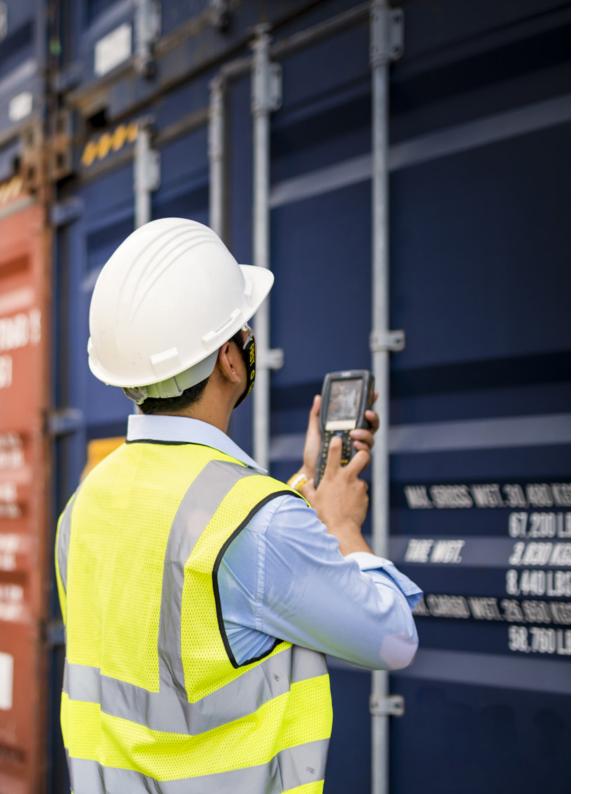
- Senior Manager at EY Abogados
- Tax Advisor at Garrigues
- Deputy Financial Director at Abertis Autopistas España
- Degree in Business Administration and Management from the University of Valencia
- Master's Degree in Taxation from Centro de Estudios Financieros

tech 56 | Course Management

Mr. Pérez Navarro, Jorge

- Tax Manager at EY Abogados
- Associate in the Transfer Pricing and International Tax Department of PwC in Valencia
- Manager of the Transfer Pricing team at Grant Thornton Spain
- Tax Advisor at Grant Thornton Spain
- Degree in Business Administration and Management from the Polytechnic University of Valencia
- Master's Degree in Tax Advisory Services by the Centro de Estudios Financieros
- Specialization in Advanced Accounting from the Centro de Estudios Financieros
- Postgraduate degree in International Taxation from the University of Valencia

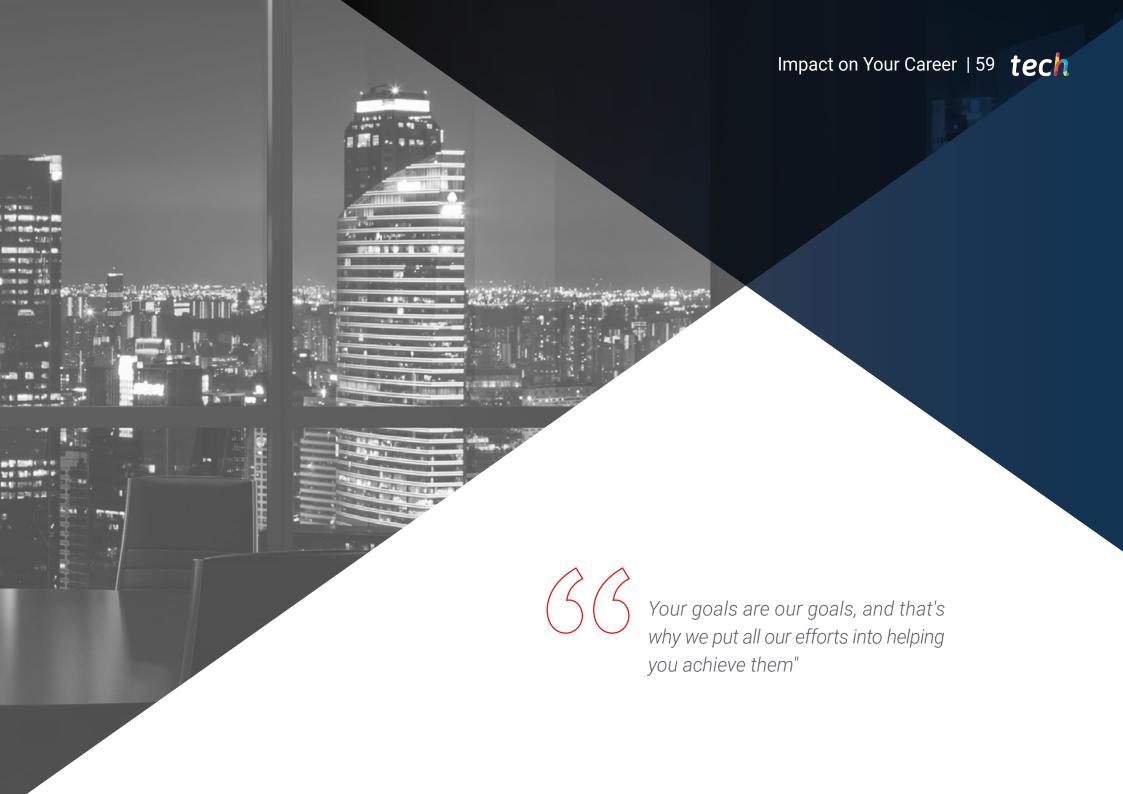






TECH has carefully selected the faculty for this program so that you can learn from today's top specialists"





If you have been looking for a promotion for some time, the completion of this program will help you achieve it by improving your skills.

Are you ready to take the leap? Excellent professional development awaits you.

The Executive Master's Degree in International Taxation, Foreign Trade and Customs of TECH Global University is an intense program that prepares professionals to face challenges and business decisions globally. Its main objective is to promote your personal and professional growth in order to help you achieve success.

If you want to improve yourself, make a positive change professionally and network with the best, this is the place for you.

Experience shows that by upgrading your training you are more likely to improve your hiring process.

Time of change

During the program

15%

During the first year

60%

After 2 years

25%

Type of change



Salary increase

This program represents a salary increase of more than 25.22% for our students

\$ 57,900 A salary increase \$ 72,500





tech 64 | Benefits for Your Company

Developing and retaining talent in companies is the best long-term investment.



Growth of talent and intellectual capital

The professional will introduce the company to new concepts, strategies, and perspectives that can bring about significant changes in the organization.



Retaining high-potential executives to avoid talent drain

This program strengthens the link between the company and the professional and opens new avenues for professional growth within the company.



Building agents of change

You will be able to make decisions in times of uncertainty and crisis, helping the organization overcome obstacles.



Increased international expansion possibilities

Thanks to this program, the company will come into contact with the main markets in the world economy.





Project Development

The professional can work on a real project or develop new projects in the field of R & D or business development of your company.



Increased competitiveness

This program will equip students with the skills to take on new challenges and drive the organization forward.







tech 68 | Certificate

This private qualification will allow you to obtain a **Executive Master's Degree in International Taxation, Foreign Trade and Customs** endorsed by **TECH Global University**, the world's largest online university.

TECH Global University is an official European University publicly recognized by the Government of Andorra (*official bulletin*). Andorra is part of the European Higher Education Area (EHEA) since 2003. The EHEA is an initiative promoted by the European Union that aims to organize the international training framework and harmonize the higher education systems of the member countries of this space. The project promotes common values, the implementation of collaborative tools and strengthening its quality assurance mechanisms to enhance collaboration and mobility among students, researchers and academics.

Mr./Ms. ________with identification document _______has successfully passed and obtained the title of:

Executive Master's Degree in International Taxation,
Foreign Trade and Customs

This is a private qualification of 1,800 hours of duration equivalent to 60 ECTS, with a start date of dd/mm/yyyy and an end date of dd/mm/yyyy.

TECH Global University is a university officially recognized by the Government of Andorra on the 31st of January of 2024, which belongs to the European Higher Education Area (EHEA).

In Andorra la Vella, on the 28th of February of 2024

This **TECH Global University** private qualification is a European program of continuing education and professional updating that guarantees the acquisition of competencies in its area of knowledge, providing a high curricular value to the student who completes the program.

Title: Executive Master's Degree in International Taxation, Foreign Trade and Customs

Modality: online

Duration: 12 months.

Accreditation: 60 ECTS



^{*}Apostille Convention. In the event that the student wishes to have their paper diploma issued with an apostille, TECH Global University will make the necessary arrangements to obtain it, at an additional cost.



Executive Master's Degree International Taxation, Foreign Trade and Customs

» Modality: online

» Duration: 12 months.

» Certificate: TECH Global University

» Accreditation: 60 ECTS

» Schedule: at your own pace

» Exams: online

