1- SUBJECT DESCRIPTION

This course is aimed at providing law students with a basic and general approach to the necessary tools, skills and knowledge on international taxation. Different international tax systems will be compared. Special attention will be provided to the main international tax topics in the area of business law.

2- OBJECTIVES AND SKILLS

- Awareness of the relevance of taxation in a globalized world.
- To provide a general understanding of direct and indirect taxation. Application of the main international tax topics to problems affecting international transactions.
- To understand the basics of international tax jurisdiction and of (the relief of) juridical and economic double taxation.
- To understand basic techniques employed in international tax planning.
- To become familiar with the main international institutions with influence in taxation matters.

3- CONTENT

**PART I. – INTRODUCTION TO THE SPANISH TAX SYSTEM**

SESSION 1

SESSION 2
Direct taxation. Indirect taxation. The example of the Spanish tax system.

SESSION 3
Comparing and contrasting tax systems (e.g. UK, US, LATAM, Spanish, France, Germany).

SESSION 4
Comparing and contrasting tax systems (e.g. UK, US, LATAM, Spanish, France, Germany).

SESSION 5
Case study. Conclusions.
PART II. - PERSONAL INCOME TAX (PIT)

SESSION 6
Spanish Personal Income Tax. The example of the Spanish tax system.

SESSION 7
Comparing and contrasting PIT (e.g. UK, US, LATAM, Spanish, France, Germany).

SESSION 8
Comparing and contrasting PIT (e.g. UK, US, LATAM, Spanish, France, Germany).

SESSION 9
Case study. Conclusions.

PART III. - CORPORATE INCOME TAX (CIT)

SESSION 10
Spanish Corporate Income Tax. The example of the Spanish tax system.

SESSION 11
Comparing and contrasting CIT (e.g. UK, US, LATAM, Spanish, France, Germany).

SESSION 12
Comparing and contrasting CIT (e.g. UK, US, LATAM, Spanish, France, Germany).

SESSION 13
Case study. Conclusions.

PART IV. - MID-TERM EXAM.

SESSION 14: Mid-term exam.

PART V. – INTERNATIONAL TAXATION

SESSION 15

SESSION 16
NRIT & Tax Treaties: Comparing and contrasting (e.g. UK, US, LATAM, Spanish, France, Germany).

SESSION 17
NRIT & Tax Treaties: Comparing and contrasting (e.g. UK, US, LATAM, Spanish, France, Germany).

SESSION 18
Case study. Conclusions.

PART VI. - MAIN INTERNATIONAL TAX TOPICS

SESSION 19
Tax residence. Permanent Establishments. Tax credits.
SESSION 20
Transfer pricing rules.

SESSION 21
Equity and debt. Spanish Earnings stripping rules. Holding companies. Participation exemption

SESSION 22
Comparing and contrasting (e.g. UK, US, LATAM, Spanish, France, Germany): Transfer Pricing. Holding companies, debt tax implications.

SESSION 23
Comparing and contrasting (e.g. UK, US, LATAM, Spanish, France, Germany). Transfer Pricing. Holding companies, debt tax implications.

SESSION 24
Real estate assets. Intangible assets. Capital gains.

SESSION 25
Controlled Foreign Corporation Rules.

SESSION 26
Corporate and business restructurings.

SESSION 27

PART VII. – INDIRECT TAXATION: VALUE ADDED TAX, TRANSFER TAX, STAMP DUTY

SESSION 28
Indirect taxation.

PART VIII. - FINAL EXAM

SESSIONS 29 & 30
Final exam

4- METHODOLOGY AND ECTS WEIGHING

The objectives and skills of this course will be pursued through a combination of methods including lectures, class presentations and debates and case study exercises. Students will be requested to prepare in advance the assigned topic presentations and to participate in formal (case studies) and/or informal discussions. Students will also need to be ready to take class notes in those lectures with no assigned readings support.

<table>
<thead>
<tr>
<th>TEACHING METHODOLOGY</th>
<th>WEIGHING</th>
<th>ESTIMATED TIME A STUDENT SHOULD DEDICATE TO PREPARE FOR:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lectures</td>
<td>6%</td>
<td>10 hours</td>
</tr>
<tr>
<td>Personal learning, class preparation, presentations and case studies</td>
<td>84%</td>
<td>125 hours</td>
</tr>
<tr>
<td>Exam (minimum grade 5)</td>
<td>10%</td>
<td>15 hours</td>
</tr>
<tr>
<td>TOTAL</td>
<td>100%</td>
<td>150 hours are required for a 6 ECTs course (30 sessions)</td>
</tr>
</tbody>
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5- EVALUATION SYSTEM

Student’s final grade will be based on both individual and group work of different characteristics that will be weighed in the following way:

<table>
<thead>
<tr>
<th>A.</th>
<th>Class participation</th>
<th>25%</th>
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</thead>
<tbody>
<tr>
<td>B.</td>
<td>Presentations and case studies</td>
<td>50%</td>
</tr>
<tr>
<td>C.</td>
<td>Final Exam (minimum grade 5)</td>
<td>25%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td></td>
<td>100%</td>
</tr>
</tbody>
</table>

5.1. GENERAL OBSERVATIONS

Each student has four attempts over two consecutive academic years to pass this course.

Students must attend at least 70% of the sessions and obtain a minimum grade of 5 at the final exam to pass this course. Students who do not comply with the 70% attendance rule will lose their 1st and 2nd chance, and go directly to the 3rd one (they will need to enroll again in this course next academic year).

Students who are in third or fourth call should contact the professor during the first two weeks of the course.

RETAKE POLICY

If a student’s course grade is below 5.0, the student is required to take the retake exam to pass the course. The maximum grade that students can obtain in the retake exam period is 8.0.

A student who has missed over 30% of the class meetings will not be allowed to take the retake exam, but will only have two attempts left to pass the course during the following academic year.

Students who are in third or fourth call should contact the teacher during the first two weeks of the course.

6- USE OF ELECTRONIC DEVICES IN CLASS

This subject does not require the use of a laptop in class; nevertheless, if you want to bring your laptop, please contact your professor.