

# International taxation

**MASTER'S DEGREE MBA IN INTERNATIONAL MANAGEMENT**

***UNIVERSIDAD INTERNACIONAL MENÉNDEZ PELAYO***

This document can be used as reference documentation of this subject for the application for recognition of credits in other study programmes. For its full effect, it should be stamped by UIMP Student's Office.



## GENERAL DATA

### Brief description

The course aims to provide students with sufficient theoretical knowledge relating to the part of the tax system directly linked to actions companies carry out to enable them to perform practical analysis of the consequences of such actions in terms of fiscal cost. The aim is to optimise this process, after assessing the different alternatives for action that companies are presented with. The subject also shows a marked bias towards the internationalisation processes in which the company is immersed.

### Name

International taxation

### Code

102805

### Academic year

2024-25

### Degree

[MASTER'S DEGREE MBA IN INTERNATIONAL MANAGEMENT](#)

### ECTS Credits

2

### Type

MANDATORY

### Duration

Cuatrimestral

### Language

Spanish/English

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## Contents

### Session 1: Section 1

#### Section 1. MAIN TAX CONCEPTS

&#8226; Introduction

&#8226; Main tax concepts

### 2nd to 9th sessions: Section 2

#### Section 2. CORPORATION TAX: BASIC NOTIONS OF THE GENERAL REGIME.

&#8226; Nature and spatial scope

&#8226; Taxable event

&#8226; Subjective elements

&#8226; Tax period and accrual

&#8226; Corporate income tax settlement scheme within the general regime

&#8226; Determination of the tax base and temporary imputation rules

&#8226; Limitation on deductibility of expenses

&#8226; Valuation rules

&#8226; Double taxation exemptions

&#8226; Reductions in the tax base

&#8226; Tax rate and total tax liability

&#8226; Net tax liability and minimum taxation

&#8226; Deductions for avoiding international double taxation

&#8226; Bonuses

&#8226; Deductions to encourage certain activities

&#8226; Instalment payments and deduction of payments on account

&#8226; Tax management

&#8226; Special regimes

### 10th and 11th sessions: Section 3

#### Section 3. VAT: TAXATION OF FOREIGN TRADE. BORDER TAX ADJUSTMENTS

&#8226; Introduction

&#8226; Foreign trade with third countries

&#8226; Intra-community trade in goods

&#8226; Foreign trade in services

### 12th and 13th sessions: Section 4

#### Section 4. INTERNATIONAL TAXATION. FOREIGN INVESTMENTS IN SPAIN

&#8226; Introduction: Non-resident income tax

&#8226; Nature, purpose and scope

&#8226; Personal elements

&#8226; Subject to tax

&#8226; Income obtained through a permanent establishment

&#8226; Income derived without the intermediary of a permanent establishment

- &#8226; Withholding and payment obligation
- &#8226; Special tax on real estate of non-resident entities
- &#8226; Other provisions

#### **14th session: Section 5**

##### Section 5. INTERNATIONAL DOUBLE TAXATION TREATIES

- &#8226; Introduction: The Organisation for Economic Co-operation and Development Model Tax Convention
- &#8226; Definitions
- &#8226; Taxation on different types of income
- &#8226; Methods of avoiding international double taxation
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#### **15th and 16th sessions: Section 6**

##### Section 6. INTERNATIONAL TAXATION. SPANISH INVESTMENT ABROAD

- &#8226; Pre-investment considerations
- &#8226; Entities holding foreign securities
- &#8226; International tax transparency
- &#8226; Consequences of investment: Correcting international double taxation and other issues
- &#8226; Exemption of dividends and capital gains from foreign sources
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- &#8226; Deduction for international legal double taxation
- &#8226; Deduction for international economic double taxation
- &#8226; Staff posted abroad
- &#8226; Tax-related investment strategies
- &#8226; Basic aspects of the choice between subsidiary and branch office

## COMPETENCES

### Conocimientos

CO1 - To learn about business management analytics in dynamic and complex environments, such as the international environment.

CO2 - To acquire a body of theoretical and practical knowledge and learning skills, which will enable those who remain interested to pursue further, more specialised studies in the field of advanced research or doctoral studies.

CO3 - To master the basic tools of information and communication technologies for exercising of their profession and for learning.

CO4 - To understand the concepts, theories and instruments for analysing and developing business internationalisation plans.

CO5 - To understand the nature of problems in the organisation and therefore the application of suitable tools by developing analytical skills.

CO8 - To know the main legal and fiscal aspects that directly or indirectly affect business internationalisation processes.

CO13 - To learn to incorporate the concept of sustainability in business and institutional projects, identifying its specific areas of practical application.

CO14 - To learn to incorporate other SDG concepts, which are also relevant for international companies, in their projects, identifying their specific areas of practical application.

### Habilidades

S1 - To apply the theoretical and practical knowledge acquired, with a high degree of independence, in both national and international companies, be they small or medium-sized or companies of a more multinational dimension, and even in non-business organisations whose management requires an international vision.

S2 - To apply the analytical skills acquired in defining and approaching new problems and in searching for solutions both in a national and international business context.

S3 - To be able to collect, record and interpret macroeconomic data, country information, industry and business information, financial and accounting data, statistical data, and relevant research results to systematise business decision-making processes in international environments.

S4 - To apply the appropriate procedure to achieving an international business objective.

S5 - To assess the relationship between enterprises and the institutional framework in which activities are carried out.

S9 - To manage a business internationalisation project and assume managerial responsibilities.

## **Competencias**

C1 - To work in multidisciplinary and multicultural teams, in highly demanding situations in terms of time (deadlines for designing and executing projects and cases) and results.

C2 - To develop business and personal activities within the strictest ethical and socially responsible behaviours, as well as to develop sensitivity towards social and environmental issues.

C3 - To express themselves correctly, both orally and in writing, in Spanish and English, maintaining an appropriate image in their professional activity.

# LEARNING PLAN

## Training activities

Type of activity	Hours	% On site
TA1.- Master classes	18	100
TA2.- Practical classes	6	100
TA3.- Individual and group work	16	5
TA5.- Individual student work	20	0

## Teaching methods

The course will have a theoretical base component, which will then allow the annual corporate tax settlement to be resolved, with practical cases along the lines of those developed according to companies' tax reality.

## Learning outcomes

• To acquire the habit of consulting and interpreting the direct sources of taxation, i.e. the tax regulations (laws, regulations, etc.) in force at any given time.

• To be able to quantify the fiscal impact that a company must bear as a consequence of its business activity being successful. To quantify business operations' profitability in terms of available results, which is essential for reporting to shareholders or the company's supervisory bodies.

• To understand the legal form of foreign investments that companies can take, assessing the tax cost of the different alternatives.

• To understand the problems of international double taxation that every company suffers when its activities go beyond the borders of its own country, given the known expansive nature that the tax authorities of the different States tend to exhibit.

• To understand and evaluate the fiscal conditioning factors of international trade in goods, both with third countries and with the European Union; and in services, in the different forms in which this manifests itself.

• To have the ability to settle the annual corporate tax that companies have to face in a practical way, being able to explain this to both shareholders and tax authorities.

# EVALUATION

## Evaluation system

The final exam will consist of a 25-question multiple-choice test (all combinations of correct answers: all, one or more, or none correct). The questions must demonstrate theoretical knowledge of the subject and its practical application for assessing corporate income tax and, in particular, for international aspects.

For each question the minimum grade shall be zero (no negative grades).

Depending on class attendance, the attitude and amount of attention paid in class and the participation of each student, both in terms of the number of interventions and, above all, their relevance, the final grade achieved may be increased or decreased by 10%, depending on the merits or demerits accumulated by the participants, at the lecturer's discretion. The indicated maximum increase of 10% may also be obtained from other specific activities carried out in class.

In the second and subsequent exam sessions, the grade will depend on the tests that will be determined by the teachers (multiple-choice test, essay, oral exam, mixed or assignments) and communicated to the students sufficiently in advance.

## **FACULTY**

### **Coordinator/s**

**Paredes Gómez, Raquel**

*Doctora en Ciencias Económicas y Empresariales*

*Profesora Titular de Universidad (UCM)*

### **Lecturers**

**de la Cueva González-Cotera, Álvaro**

*Doctor en Derecho.*

*Socio J&A Garrigues SLP*

**Carrasco Matallín, Ángela**

*Licenciada en Ciencia Económicas y Empresariales por la UCM.*

*Inspectora de Hacienda del Estado.*

*AEAT.*

## BIBLIOGRAPHY AND LINKS

### Bibliography

The reference documentation for the subject is tax legislation (laws, regulations, etc.). The material uploaded on the campus (outline-summary of the 6 sections and exercises) is support material to promote better understanding of the subject.

&#8226; IVA 2024. Practical handbook. Tax Agency

&#8226; Corporate Income Tax 2023. Practical handbook. Tax Agency.

&#8226; Sistema Fiscal Espaol II (2024) (E. Albi, J.A. Rodriguez and R. Paredes). Ed. Ariel.

&#8226; Casos prticos de Sistema Fiscal (2024) (M.C. Moreno and R. Paredes). Digital Press Technique.