

**MASTER OF SCIENCE IN INTERNATIONAL BUSINESS
ACADEMIC YEAR 2014-2015**

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Course Description

In international trade, taxation is becoming a key issue and a growing area of importance due to the complexity of operations and worldwide players and the amount of rules in the international context.

In any transaction, there is a possible taxation that may be deemed either in the country where the transaction is taking place or the residency of the companies involved.

Thus, the correct decision will necessarily take into account the risk involved and a clear picture on net investment return. This allows for an understanding the net cash after paying the corresponding taxes that will be collected.

In a global economy, it may seem that taxation should be uniform, but it is not. Taxation is still regulated by bilateral agreements between countries.

That implies that it is necessary to understand the tax treaties' schemes, OCDE regulations and international rules to avoid double taxation and any liability.

Such questions will be analysed in class in order to have a general knowledge and understanding of the key issues that may rise on international trade.

Objective(s)

This course comprises 5 classes. The main objective is to understand the tax system, especially international in order to apply it in international business and transactions.

Methodology

Course material will be provided at the end of every class. The class will consist in teacher explanation previous homework to introduce into each subject. Exercises will be done in class in order to reinforce the teaching.

Evaluation criteria

The evaluation of this course will consist of:

- A written assessment consisting of three parts (i) test questions (ii) conceptual development questions and (iii) a numeric exercise. 70% of the final grade.
- Homework and class participation. 30 % of the final grade.

Students are required to attend 80% of classes. Failing to do so without justified reason will imply a 0 grade in the participation/attendance evaluation item.

As with all courses taught at the UPF ESCI-BSM, students who fail the course during regular evaluation will be allowed ONE re-take of the examination/evaluation. If the course is again failed after the re-take, students will have to register again for the course the following year.

Plagiarism is to use another's work and to present it as one's own without acknowledging the sources in the correct way. All essays, reports or projects handed in by a student must be original work completed by the student. By enrolling at ESCI-BSM Master of Science and signing the "Honor Code," students acknowledge that they understand the schools' policy on

plagiarism and certify that all course assignments will be their own work, except where indicated by correct referencing. Failing to do so may result in automatic expulsion from the program.”

Calendar and Contents (Date and Detailed Account of Topics per each of the sessions – Table format tends to work well)

The subjects that will be covered are:

Introduction to taxation.

The concept of tax, tax legislation and how it is applicable to countries of the OECD framework will be analysed. The different types of taxes will also be discussed.

Different taxes that apply to OCDE countries.

Direct and indirect taxes, how they work and the implications on international trade will be examined.

Taxation of non-residents.

The treatment of resident tax payers and non-residents that act in international transactions, International taxation for companies that act as non-residents and the mechanisms to avoid double taxation will be covered.

Definition of permanent establishment.

The definition of permanent establishment is a key issue where taxes are applied. Business models of multinational corporations will be studied.

International tax planning.

We will analyse the different investment schemes and business models to perform investments in multinational markets.

Bio of Professor

Born in Barcelona in 1972. In 1995 he obtained a degree in Law from Universidad of Barcelona and in 2014 a degree in Economics from U.A.O.

He is an active member of the Ilustre Colegiode Abogados de Barcelona.

He obtained a Master’s Degree in Marketing and Financial Management from EADA, the Program for Management Development at the Instituto de Estudios Superiores de la Empresa (IESE and Harvard Law School).

Antonio is member of the Fiscal Commission at the Barcelona Chambers of Commerce, Navigation and Industry and collaborates with many educative institutions.

His professional career began in 1995 working for Arthur Andersen as Account Auditor. From 1998 to 2006 worked for Garrigues at the Tax Department.

Since 2006 he has been partner in charge of national and international department at Global Abogados.