Datastat Research
Building Capacity in Training and Research

DATASTAT TRAINING IN

OFFICIAL COURSE PROSPECTUS

Center for Advanced Research & Professional Development

Nairobi Training Center • Global Virtual Academy • Corporate On-Site

ACCOUNTING AND FINANCE

International Taxation and Cross-Border Tax Structuring Training Course

Comprehensive Course Syllabus, Practical Modules & Upcoming Schedules

PROGRAM SPECIFICATIONS & HIGHLIGHTS

DURATION
10 Days Practical Hands-on

DELIVERY MODES
In-Person Class & Live Virtual

CERTIFICATION
Accredited Certificate of Completion

INTAKES / DATES
Multiple Cohort Schedules Included

PREPARED FOR:

Valued Participant

Email: training@datastatresearch.org | Issued: November 25, 2026

Academic & Professional Training Year: 2026

DATASTAT TRAINING INSTITUTE

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Training Centers: Nairobi • Mombasa • Kigali • Dubai • Live Virtual Academy

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International Taxation and Cross-Border Tax Structuring Training Course

Accounting and Finance • 10 Days Intensive • Accredited Certification

Course Overview

International Taxation and Cross-Border Tax Structuring Training Course provides comprehensive knowledge and practical skills in international tax planning, global tax compliance, transfer pricing, double taxation agreements, and cross-border financial structuring.

Key Skills & Software Tools Covered

MS Word • Thomson Reuters ONESOURCE • Bloomberg Tax • and Microsoft Excel

Upcoming Training Schedules

Confirmed cohort intakes and venues. Both physical in-person classroom and live virtual online seats are available.

TRAINING DATES	LOCATION / VENUE	FORMAT / DURATION	INVESTMENT (FEE)
7 Dec 2026 – 18 Dec 2026	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
21 Dec 2026 – 1 Jan 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
4 Jan 2027 – 15 Jan 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
18 Jan 2027 – 29 Jan 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
1 Feb 2027 – 12 Feb 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
15 Feb 2027 – 26 Feb 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
1 Mar 2027 – 12 Mar 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
15 Mar 2027 – 26 Mar 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
29 Mar 2027 – 9 Apr 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
12 Apr 2027 – 23 Apr 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
26 Apr 2027 – 7 May 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
10 May 2027 – 21 May 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
24 May 2027 – 4 Jun 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
7 Jun 2027 – 18 Jun 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
21 Jun 2027 – 2 Jul 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
5 Jul 2027 – 16 Jul 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
19 Jul 2027 – 30 Jul 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
2 Aug 2027 – 13 Aug 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
16 Aug 2027 – 27 Aug 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
30 Aug 2027 – 10 Sep 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
13 Sep 2027 – 24 Sep 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
27 Sep 2027 – 8 Oct 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**

11 Oct 2027 – 22 Oct 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
25 Oct 2027 – 5 Nov 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
8 Nov 2027 – 19 Nov 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
22 Nov 2027 – 3 Dec 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**
6 Dec 2027 – 17 Dec 2027	Nairobi	Classroom / 10d	**$3,000 USD / KES 220,000**

* Corporate discounts and customized cohort scheduling are available for teams of 3 or more participants.

Course Curriculum & Modules

International Taxation and Cross-Border Tax Structuring Training Course

Introduction

International Taxation and Cross-Border Tax Structuring Training Course provides comprehensive knowledge and practical skills in international tax planning, global tax compliance, transfer pricing, double taxation agreements, and cross-border financial structuring. The course explores the complexities of international tax regulations, multinational enterprise taxation, permanent establishment risks, withholding taxes, tax treaties, and Base Erosion and Profit Shifting (BEPS). Participants gain insights into evolving international tax frameworks, Organisation for Economic Co-operation and Development (OECD) guidelines, United Nations tax conventions, and global tax transparency standards.

The programme emphasizes strategic tax optimization, international corporate restructuring, digital economy taxation, foreign investment structures, and cross-border transaction management. Through practical exercises and global case studies, participants learn to identify international tax risks, evaluate jurisdictional tax implications, strengthen regulatory compliance, and develop sustainable tax strategies. The training also examines emerging developments in global minimum taxation, Pillar Two implementation, beneficial ownership, and international tax dispute resolution, equipping professionals to navigate complex multinational business environments effectively.

Course Objectives

- Understand international taxation principles and global tax frameworks.
- Develop strategic cross-border tax planning capabilities.
- Interpret OECD guidelines and BEPS compliance requirements.
- Analyse double taxation agreements and tax treaty provisions.
- Evaluate transfer pricing policies and documentation.
- Identify permanent establishment and withholding tax risks.
- Understand global minimum taxation and Pillar Two rules.
- Apply international tax compliance and reporting standards.
- Evaluate multinational corporate restructuring strategies.
- Assess digital economy taxation and emerging regulations.
- Strengthen tax risk management and mitigation strategies.
- Understand international tax dispute resolution mechanisms.
- Develop sustainable tax-efficient investment structures.

Organizational Benefits

- Improved international tax compliance and governance.
- Reduced cross-border tax exposure and financial risks.
- Enhanced multinational tax planning efficiency.
- Better transfer pricing management and documentation.
- Improved foreign investment structuring decisions.
- Reduced double taxation and treaty-related risks.
- Stronger international financial reporting practices.
- Enhanced regulatory transparency and accountability.
- Improved corporate restructuring strategies.
- Sustainable global tax management and competitiveness.

Target Audiences

- International tax consultants and advisors.
- Chief Financial Officers and finance directors.
- Corporate tax managers and accountants.
- Multinational enterprise executives.
- Transfer pricing specialists.
- Legal practitioners and corporate lawyers.
- Investment and financial analysts.
- Government revenue authorities and tax administrators.

Course Duration: 10 days

Course Modules

Module 1: Foundations of International Taxation

- Principles and scope of international taxation.
- Residence-based and source-based taxation.
- International tax jurisdiction and sovereignty.
- Global tax systems and regulatory frameworks.
- Taxation of individuals and multinational corporations.
- Case study: International taxation frameworks in the United States and United Kingdom.

Module 2: International Tax Treaties and Double Taxation

- Structure of bilateral tax treaties.
- OECD and United Nations Model Tax Conventions.
- Treaty benefits and limitation provisions.
- Tax residency and treaty eligibility.
- Mutual Agreement Procedures.
- Case study: Kenya–United Kingdom double taxation agreement.

Module 3: Transfer Pricing and Compliance

- Arm's length principle and comparability analysis.
- Transfer pricing methods and benchmarking.
- Master files, local files and country-by-country reporting.
- Intercompany transactions and documentation.
- Transfer pricing audits and adjustments.
- Case study: Multinational transfer pricing disputes involving Amazon.

Module 4: Base Erosion and Profit Shifting (BEPS)

- BEPS action plans and implementation.
- Harmful tax practices and treaty abuse.
- Country-by-country reporting requirements.
- Tax transparency and information exchange.
- Anti-avoidance legislation.
- Case study: OECD BEPS implementation across European jurisdictions.

Module 5: Permanent Establishment and Withholding Taxes

- Permanent establishment definitions and thresholds.
- Dependent and independent agents.
- Withholding tax on dividends, interest and royalties.
- Cross-border service taxation.
- Tax exposure and mitigation strategies.
- Case study: International construction projects and permanent establishment risks.

Module 6: Cross-Border Corporate Tax Structuring

- International holding company structures.

- Subsidiary and branch taxation.
- Corporate ownership and group restructuring.
- Tax-efficient financing arrangements.
- Substance requirements and beneficial ownership.
- Case study: European multinational holding company structures.

Module 7: International Mergers and Acquisitions Taxation

- Cross-border acquisition tax implications.
- Share purchases versus asset purchases.
- Tax due diligence and transaction structuring.
- Goodwill, capital gains and tax losses.
- Post-acquisition tax integration.
- Case study: Microsoft acquisition of LinkedIn.

Module 8: Global Minimum Taxation and Pillar Two

- OECD Pillar Two framework.
- Global Anti-Base Erosion (GloBE) rules.
- Income Inclusion Rule and Undertaxed Profits Rule.
- Qualified Domestic Minimum Top-up Taxes.
- Effective tax rate calculations.
- Case study: Global minimum tax implementation in the European Union.

Module 9: Digital Economy and International Taxation

- Digital services taxation frameworks.
- Taxation of multinational digital platforms.
- E-commerce and cross-border transactions.
- Digital permanent establishment challenges.
- Emerging international digital tax regulations.
- Case study: Digital taxation approaches in France and India.

Module 10: International Tax Planning and Risk Management

- Strategic international tax planning.
- Identification of cross-border tax risks.
- Tax risk assessment and internal controls.
- Anti-avoidance and economic substance requirements.
- Tax governance and compliance monitoring.
- Case study: International tax risk management at Unilever.

Module 11: Foreign Direct Investment and Tax Incentives

- Foreign direct investment taxation.
- Investment incentives and tax holidays.
- Special economic zones and export processing zones.
- Repatriation of profits and capital.
- Investment treaty considerations.
- Case study: Singapore's foreign investment tax incentive framework.

Module 12: International Taxation of Financial Transactions

- Cross-border debt and equity financing.
- Interest deductibility and thin capitalization.
- Hybrid financial instruments.
- Foreign exchange taxation.
- Financial derivatives and international withholding taxes.
- Case study: Cross-border financing structures in global banking.

Module 13: International Tax Audits and Dispute Resolution

- International tax audit procedures.
- Tax assessments and appeals.
- Advance Pricing Agreements.
- Mutual Agreement Procedures and arbitration.
- Tax controversy management.
- Case study: OECD-led international transfer pricing dispute resolution.

Module 14: Tax Transparency and Regulatory Compliance

- Automatic Exchange of Information.
- Common Reporting Standard requirements.
- Foreign Account Tax Compliance Act.
- Beneficial ownership disclosure.
- Anti-Money Laundering and tax transparency.
- Case study: Switzerland's implementation of international financial information exchange.

Module 15: Emerging Trends and Strategic Global Tax Management

- Artificial intelligence in tax compliance and analytics.
- Global tax policy developments and reforms.
- Sustainable taxation and environmental tax frameworks.
- International tax technology and automation.
- Future challenges in multinational tax structuring.
- Case study: Global Pillar Two adoption and multinational tax transformation.

Training Methodology

- Expert-led presentations and interactive discussions.
- Practical international tax planning exercises.
- Global case study analysis and group assignments.
- Transfer pricing simulations and treaty interpretation.
- Cross-border corporate structuring workshops.
- Real-world tax compliance scenarios and problem-solving.
- Group presentations and knowledge-sharing sessions.
- Practical assessments and end-of-course evaluation.

Register as a group from 3 participants for a Discount

Send us an email: info@datastatresearch.org or call +254724527104

Certification

Upon successful completion of this training, participants will be issued with a globally- recognized certificate.

Tailor-Made Course

We also offer tailor-made courses based on your needs.

Key Notes

a. The participant must be conversant with English.

b. Upon completion of training the participant will be issued with an Authorized Training Certificate

c. Course duration is flexible and the contents can be modified to fit any number of days.

d. The course fee includes facilitation training materials, 2 coffee breaks, buffet lunch and A Certificate upon successful completion of Training.

e. One-year post-training support Consultation and Coaching provided after the course.

f. Payment should be done at least a week before commence of the training, to DATASTAT CONSULTANCY LTD account, as indicated in the invoice so as to enable us prepare better for you.

Certification & Learning Methodology

- Hands-on practical delivery with real-world datasets, case studies, and lab exercises.
- Post-training mentorship, access to class resources, and customized follow-up support.
- Participants who successfully complete the course receive an accredited Datastat Certificate of Completion.

How to Enroll & Reserve Your Seat

1. Online Registration: Visit https://datastatresearch.org/courses/international-taxation-and-cross-border-tax-structuring-training-course to register online.
2. Email Booking: Send participant details to training@datastatresearch.org for official invoice & reservation.
3. Support & Assistance: Inquire via phone +254 724 527 104 | +254 734 969 612.