COMC010 – International Taxation and Regulatory Strategy

Masters of Commerce
Semester IV
DSC - Core Paper
International Taxation and Regulatory Strategy

Course Type/ Course Code	Course Title	Lectures	Tutorials	Practical	Credit	Pre-requisites
COMC010	International Taxation and Regulatory Strategy	3	1	0	4	NIL

Objective: The course aims to provide a nuanced understanding of key concepts and practices in international taxation and related regulatory strategies. The course will equip students with the analytical skills to understand and evaluate the global tax frameworks, including residence and source-based taxation, double taxation avoidance, transfer pricing, and anti-avoidance measures.

Learning Outcomes: On completion of this course, the student should be able to:

- Interpret the foundational concepts of international taxation, treaty models, and the need for tax coordination;
- Analyse and interpret complex tax treaty provisions and apply them to real-world cross-border tax scenarios;
- Apply transfer pricing methods and understand documentation and compliance requirements;
- Evaluate the effectiveness of anti-avoidance tools;
- Identify regulatory strategies that align with global transparency standards.

Contents:

Unit I **(11 Hours)**

International taxation – Genesis, tax conflicts (residence and source based) and mechanism; Evolution of international tax policies; Role of international organizations in shaping tax regimes; International Double Taxation Avoidance: Methods and Models

Unit II **(8 Hours)**

Key Treaty Provisions: Permanent Establishment (PE), business income, royalties, interest, dividends, and capital gains; Impact of treaties; Treaty planning and misuse; Vienna Convention principles.

Unit III **(11 Hours)**

Advanced Transfer Pricing Strategies-Conceptual definition and applicability; Arm's Length Price; Safe Harbour Rules; General Anti Avoidance Rules (GAAR)-Scope, provisions, GAAR vs SAAR; Base Erosion and Profit Shifting (BEPS) Action Plans: overview and country implementation trends

Unit IV **(15 Hours)**

Global Compliance Frameworks: Role of Automatic Exchange of Information (AEOI), Common Reporting Standard (CRS), and FATCA in regulatory compliance; Regulatory responses to tax avoidance and evasion: Controlled Foreign Corporation (CFC) rules, thin capitalization, and interest limitation; Environmental taxation and sustainability-linked tax policies: Emerging regulatory trends

Tutorial Exercise:

- Take the case of two countries, one following residence-based taxation system and the other following source-based taxation system, and both countries having a Double Taxation Avoidance Agreement (DTAA) between them. Analyse the DTAA to identify the method of relief and related provisions thereto. Demonstrate and compare, using revenue figures for a company, the total tax payable in each country (i) without relief from double taxation and (ii) with relief as provided under the DTAA.

- Interpret, compare, and apply key provisions of the UN Model Double Taxation Convention and the OECD Model Tax Convention through a realistic cross-border taxation case.

Suggested Readings:

- Lang, M. (2021). *Introduction to the Law of Double Taxation Conventions* (3rd ed.). IBFD
- Chhawchharia, R. (2025). Direct Tax Laws and International Taxation, *Taxmann Publications*
- Baxi, D. and Shetty, S. (2025). International Taxation, *Taxmann Publications*
- BEPS (2025). https://www.oecd.org/en/topics/policy-issues/base-erosion-and-profit-shifting-beps.html#related-publications
- OECD (2017). Model Convention on Income and Capital.
- OECD (2022). Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations.