

of taxation relevant to compensation for expatriates: tax equalization, tax protection, currency fluctuations

**Unit IV: Global Context of Training and Industrial Relations (9 Hours)**

Training & development of international staff: Areas of global training, cross cultural training, Diversity training. Cross cultural team building; Cross border Mergers and Acquisitions: HRM perspective; International IR: Key Players, Labour unions, Employee relations. Approaches in IR for global operations; changes in IR landscape across different countries. Strategic decision making for IHRM issues. Control issues in IHRM in global companies - head office vs. local office. Impact of legislation and free trade agreements on HRM issues across national borders.

**Essential/ recommended Readings (latest edition of readings to be used)**

1. Dowling, P.J., Festing, M. & Engle Sr, A.D. (2013). *International Human Resource Management*. Wiley
2. Nilanjan, S. & Bhattacharya, M. (2010). *International Human Resource Management*. Excel Books.
3. Briscoe, D., Briscoe, D.R., Schuler, R.S., & Claus, L. (2008). *International Human Resource Management: Policies and practices for multinational enterprises*. Routledge.
4. Tayeb, M. (2005). *International human resource management: A multinational company perspective*. Oxford University Press.

**Suggestive Readings**

1. Dowling, P.J. and Welch, D.E. (2017). *International Human Resource Management*. Cengage Learning
2. Bhattacharyya, D. K. (2010). *Cross-cultural management*. PHI Learning Pvt. Ltd.
3. Edwards, T., & Rees, C. (2006). *International human resource management: Globalization, national systems and multinational companies*. Pearson Education.

**Note:** Examination scheme and mode shall be as prescribed by the Examination Branch, University of Delhi, from time to time.

**DISCIPLINE SPECIFIC ELECTIVE - GLOBAL BUSINESS MANAGEMENT (DSE-10)**

**DSE 10: CORPORATE TAXATION AND GLOBAL COMPANIES**

**Credit distribution, Eligibility and Pre-requisites of the Course**

Course title & Code	Credits	Credit distribution of the course			Eligibility criteria	Pre-requisite of the course (if any)
		Lecture	Tutorial	Practical/ Practice		
Corporate Taxation and Global Companies (DSE 10)	4	3	1	0	2 <sup>nd</sup> Year Undergraduate	Basics of Finance and Accounting

## Learning Objective

- The objective of this course is to acquaint learners with the international corporate taxation structure and its implications on companies.

## Learning Outcomes

On successful completion of the course the learner will be able to:

- Explain the concepts of International taxation.
- Describe the treaties and conventions governing the international taxation.
- Apply the knowledge, improve their understanding of international taxation and identify and evaluate the impact of different tax planning scenarios.
- Prepare for work within an international tax environment in a multinational firm

## SYLLABUS FOR DSE 10

### Unit 1: Introduction to Corporate Taxation

(12 Hours)

Definition of corporate, types of companies: domestic company and foreign company, tax rate and additional benefits, corporation not seeking any incentives / exemption; corporation seeking incentives / exemptions and new manufacturing companies.

Sources of Income of a company: Profits earned from the business, Capital gains, Income from renting property, Income from other sources like dividend, interest etc.

Corporate tax rate for domestic companies and foreign companies, tax rates, Section 115BA, 115BAA, 115 BAB. Surcharge, cess, MAT.

Overview of Transfer Pricing; specified domestic transactions; Generally Accepted Cost Accounting Principles; Arm's Length Pricing; Advance Pricing Agreement; Safe Harbour Rules.

Jurisdiction for Corporate Taxation in international operations.

### Unit 2: International Tax Conventions and Treaties

(9 Hours)

Overview of Model Tax Conventions

OECD model tax convention, UN model tax convention, US Model tax convention.

Tax treaties, Application and Interpretation: Features of tax treaties, Overview of tax information exchange agreements, commentaries and their importance, role of Vienna convention in application and interpretation of tax treaties.

Overview of tax regimes. Overview of tax harmonization.

### Unit 3: Tax Management and Planning for Corporates

(12 Hours)

Double taxation: concept, capital export neutrality, capital import neutrality, method of avoiding double taxation.

Double Taxation Avoidance Agreement: Meaning, objectives; types of income included under the DTAA (Services originated and provided within India; Salary from India; income from property within India; Capital gains from India; FD and Savings Account in India),

Double taxation relief: Concept, types of relief, Double taxation provisions under the Income tax Act 1961, concept of permanent establishment, taxation of business process outsourcing units in India.

#### **Unit 4: Taxation Aspects for Global Business**

**(12 Hours)**

Tax Planning with reference to business restructuring- Amalgamation, Demerger, Slump Sale, Transfer between holding and subsidiary companies. Taxation aspects of managerial decisions for international expansion. Tax avoidance, tax havens, tax management strategies for international companies. Overview of taxation implications for expatriates and repatriated employees. Planning and Restructuring Foreign Operations. Foreign Currency management for global business operations.

#### **Essential/recommended Readings (latest edition of readings to be used)**

- 1, Bittker, B. I., & Lokken, L. (2018). *Fundamentals of international taxation*. Thomson Reuters.
  1. Herzfeld, M. (2023). *International Taxation in a Nutshell*. (13th ed.). West Academic.
  2. Peroni, R. J., Gustafson, C. H., & Pugh, R. C. (Eds.). (2022-23). *International Income Taxation: Code and Regulations, Selected Sections*. CCH Wolters Kluwer
  3. Singhania, V. K., & Singhania, M. (2019). *Corporate Tax Planning Business Tax Procedures* (23rd ed). Taxmann
  4. Ahuja, G. & Gupta R. (2023). *Simplified Approach to Corporate Tax Planning and Management*. (2023). Bharat Law House private limited.

#### **Suggestive Readings (latest editions of readings to be used)**

1. Isenbergh, J., and Wells, B. (2019). *International Taxation*. Foundation Press
2. Scholes, M. S., Wolfson, M. A., Erickson, M., Maydew, E., & Shevlin, T. (2014). *Taxes & business strategy*. Upper Saddle River, NJ: Prentice Hall.
3. Singhania, V. K., & Singhania, M. (2015). 2016. *Students' guide to income tax*. Taxmann
4. Ahuja, G. & Gupta, R. (2020). *Direct Tax Laws*. (39th ed). CCH Wolters Kluwer
5. OECD on International Taxation (<https://www.oecd.org/g20/topics/international-taxation/>)
6. OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2022 (<https://www.oecd.org/tax/transfer-pricing/oecd-transfer-pricing-guidelines-for-multinational-enterprises-and-tax-administrations-20769717.htm>)
7. IMF on Corporate Taxation in the Global Economy (<https://www.imf.org/en/Publications/Policy-Papers/Issues/2019/03/08/Corporate-Taxation-in-the-Global-Economy-46650>)

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