International Taxation & Transfer Pricing
16th Nov to 27th Nov 2026

	Sessions (Each 50 minutes)
16.11.2026 (Monday)	Opening Ceremony, Joining Formalities & Introduction to the Course (50 minutes) 1. Economic Concepts relevant to International Taxation (50 minutes) 2. Understanding Global Tax Governance – OECD, UN, IMF, World Bank, WTO's Role (50 minutes) 3. Overview, Basic Concepts & Scope of International Taxation (100 minutes) 4. Group Work: Preparation for Symposium (50 minutes)
17.11.2026 (Tuesday)	1. The Model Tax Conventions (50 minutes) 2. Anatomy of a Tax Treaty (50 minutes) 3. Permanent Establishment (PE): Definition and Evolution (50 minutes) 4. Residence of Individuals and Companies under Tax Treaties (50 minutes) 5. Taxation of Cross-Border Income (Dividends, Interest, Royalties) (50 minutes) 6. Group Work: Preparation for Symposium (50 minutes)
18.11.2026 (Wednesday)	1. Withholding Tax Mechanism and Treaty Overrides (50 minutes) 2. Business Profits Attribution under Article 7 (50 minutes) 3. Employment Income & Directors' Fees: Article 15-16 (50 minutes) 4. Capital Gains Taxation in Cross-Border Contexts (50 minutes) 5. Taxation of Shipping and Air Transport Income (50 minutes) 6. Group Work: Preparation for Symposium (50 minutes)
19.11.2026 (Thursday)	1. Curbing Tax Base Erosion: Hybrid Mismatches & CFC Rules (50 minutes) 2. Anti-Avoidance Measures in Context of Tax Treaties (100 minutes) 3. Tax Cooperation in a Globalized World: MAP, EOI, CRS, FATCA & APAs (100 minutes) 4. Group Work: Preparation for Symposium (50 minutes)
20.11.2026 (Friday)	1. Concept & Need for Transfer Pricing Regulations (50 minutes) 2. Arms-Length Principle (ALP): Concept and Evolution (50 minutes) 3. Transfer Pricing Methods (CUP, RPM, CPM, TNMM, Profit Split) (100 minutes) 4. Overview of Comparability Analysis and Functional Analysis (50 minutes) 5. Group Work: Preparation for Symposium (50 minutes)
21th & 22th Nov, 2026 (Sat-Sun)	
23.11.2026 (Monday)	1. Selection of the Most Appropriate Method (50 minutes) 2. Selection of the Most Appropriate Method (Contd.) (50 minutes) 3. TP Documentation Requirements (50 minutes) 4. Risk Analysis and Demarcation of Functions in MNEs (50 minutes) 5. Transfer Pricing in Intra-Group Services and Intangibles (50 minutes) 6. Group Work: Preparation for Symposium (50 minutes)
24.11.2026 (Tuesday) Guru Nanak birth anniversary national holiday	
25.11.2026 (Wednesday)	1. Transfer Pricing in Financial Transactions (50 minutes) 2. Transfer Pricing for Tangible Goods (50 minutes) 3. Location Savings and Synergies in TP Analysis (50 minutes)

	4. India's APA Mechanism: An Insightful Study (50 minutes) 5. India's APA Mechanism: An Insightful Study (Contd.) (50 minutes) 6. Group Work: Preparation for Symposium (50 minutes)
26.11.2026 (Thursday)	1. BEPS Action Plan: Going Deep (50 minutes) 2. BEPS Action Plan: Going Deep (Contd.) (50 minutes) 3. Tax Challenges of the Digital Economy (50 minutes) 4. Digital Economy and Pillar One (50 minutes) 5. Global Minimum Tax – Pillar Two (50 minutes) 6. Group Work: Preparation for Symposium (50 minutes)
27.11.2026 (Friday)	1. Symposium (50 minutes) 2. Symposium (Contd.) (50 minutes) 3. Symposium (Contd.) (50 minutes) 4. Symposium (Contd.) (50 minutes) 5. Panel Discussion: Building a Career in International Tax and Transfer Pricing (50 minutes) 6. Closing Ceremony followed by Tea & Refreshments (50 minutes)