



# INTERNATIONAL TAXATION BOOT CAMP ON 'TAX TREATIES: CONTEMPORARY LAW AND PRACTICE' | DECEMBER 19 & 20

## DAY 1 SCHEDULE

8:45 – 9:00	Registration & Attendance / Tea
9:00 – 9:15	Welcome, Ground Rules & Speaker Introductions
9:15 – 10:45	Introduction to International Taxation
10:45 – 11:15	Tea Break
11:15 – 12:45	Fundamentals of Tax Treaty Interpretation and Personal Scope
12:45 – 2:00	Lunch
2:00 – 3:30	Business Income: Permanent Establishments
3:30 – 4:00	Tea Break
4:00 – 5:30	Business Income: Attribution
5:30	Tea

Interested candidates must submit their registration request through the Registration Form between November 19 and December 8, 2025



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## DAY 2 SCHEDULE

8:45 – 9:00	Tea
9:00 – 10:30	Passive Income: Royalties & Fees for Technical Services
10:30 – 11:00	Tea Break
11:00 – 12:30	Anti-Abuse Rules: Principal Purpose Test and General Anti-Avoidance Rule
12:30 – 1:45	Lunch
1:45 – 3:15	Most Favoured Nation Clauses
3:15 – 3:30	Tea Break
3:30 – 5:00	Dispute Resolution
5:00 – 5:30	Closing Remarks & Feedback
5:30	Tea

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