Base Erosion & Profit Shifting (BEPS) Impacts Training Course

Professional Development Training Course Outline

Category	Taxation and Revenue	**Duration**	5 Days
Base Fee	$1,500 USD	**Delivery Mode**	Online / On-site Hybrid

Course Introduction

Base Erosion and Profit Shifting (BEPS) Impacts Training Course provides an in-depth understanding of the OECD/G20 BEPS framework and its implications on multinational enterprises (MNEs). Participants will explore strategies used by corporations to shift profits and minimize tax liabilities, as well as the global efforts to counter such practices through transparency, substance, and fairness. The course examines the 15 BEPS Action Plans and their implementation across various jurisdictions.

By the end of this course, participants will have a clear understanding of the compliance obligations, tax risks, and strategic responses associated with BEPS regulations. This program also delves into the evolving landscape of international tax cooperation, the digital economy's challenges to traditional tax systems, and how countries are implementing minimum global tax standards. Participants will learn how to evaluate intercompany transactions, identify aggressive tax planning structures, and adopt best practices to mitigate BEPS-related risks. The course integrates real-world case studies from multinational corporations, providing insights into regulatory enforcement and dispute resolution under BEPS frameworks.

Programme Curriculum

Base Erosion & Profit Shifting (BEPS) Impacts Training Course

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Course Objectives

By the end of this training, participants will be able to:

1. Understand the concept, objectives, and scope of the BEPS initiative.
2. Identify the 15 BEPS Action Plans and their implications on corporate tax structures.
3. Evaluate how BEPS affects transfer pricing, digital taxation, and profit allocation.
4. Interpret country-by-country (CbC) reporting requirements and global transparency measures.
5. Analyze double tax treaty abuse and anti-avoidance mechanisms under BEPS.
6. Assess the impact of BEPS on global value chains and multinational tax planning.
7. Examine tax policy reforms and compliance strategies across different jurisdictions.
8. Manage tax risk exposure and align corporate practices with international standards.
9. Understand the role of Pillar One and Pillar Two in the global minimum tax debate.
10. Review practical case studies of BEPS audits and enforcement actions.
11. Formulate corporate governance strategies for BEPS compliance.
12. Strengthen internal reporting and documentation practices for tax transparency.
13. Develop an action plan for ongoing monitoring and implementation of BEPS measures.

Target Audience

This course is designed for:

1. Tax Directors and Managers
2. Chief Financial Officers (CFOs)
3. Transfer Pricing Specialists
4. Legal and Compliance Officers
5. Financial Analysts and Auditors
6. Policy Advisors and Regulators
7. Accountants and Consultants in Multinational Firms
8. Tax Administrators and International Tax Practitioners

Course Duration: 5 days

Course Modules

Module 1: Overview of BEPS and Its Global Impact

- Understanding the origins and evolution of BEPS
- OECD/G20 framework and objectives
- Global tax fairness and transparency initiatives
- Key challenges in combating base erosion
- The impact on multinational tax strategies
- **Case Study:** OECD BEPS implementation in the EU

Module 2: The 15 BEPS Action Plans Explained

- Overview of each BEPS Action Plan
- Actions addressing harmful tax practices
- Transfer pricing documentation requirements
- Prevention of treaty abuse
- Implementation challenges and local adaptations
- **Case Study:** BEPS Action 13 – Country-by-Country Reporting

Module 3: Transfer Pricing and BEPS Implications

- The link between BEPS and transfer pricing
- Risk assessment and functional analysis
- Profit allocation and arm's length principle adjustments
- Transfer pricing documentation under BEPS
- Managing intercompany transactions
- **Case Study:** Multinational transfer pricing audit under BEPS rules

Module 4: Digital Economy and BEPS

- Tax challenges arising from digitalization
- Pillar One: Reallocation of taxing rights
- Pillar Two: Global minimum tax framework
- Digital services taxes (DSTs) and global responses
- Compliance strategies for digital businesses
- **Case Study:** BEPS implications for global tech companies

Module 5: Tax Treaties and Anti-Avoidance Measures

- BEPS impact on tax treaties and the Multilateral Instrument (MLI)
- Treaty shopping and hybrid mismatch arrangements
- Controlled Foreign Company (CFC) rules
- Limitation of benefits (LOB) clauses
- Withholding taxes and double taxation prevention
- **Case Study:** Analysis of the BEPS MLI in cross-border treaties

Module 6: Compliance, Reporting & Documentation

- Country-by-country (CbC) reporting requirements
- Master file and local file documentation
- Data management and confidentiality
- Reporting obligations for MNEs
- Tax authority audits and information exchange
- **Case Study:** Managing CbC compliance in a global corporation

Module 7: BEPS Risk Management & Corporate Governance

- Identifying and managing BEPS-related risks
- Internal controls and corporate governance structures
- Aligning tax policy with business strategy
- Monitoring BEPS updates and compliance deadlines
- Integrating BEPS in risk management frameworks
- **Case Study:** Internal governance model for BEPS compliance

Module 8: Future of BEPS and International Tax Cooperation

- Post-BEPS global tax landscape
- Role of the Inclusive Framework and global cooperation
- BEPS 2.0 and the evolving digital economy
- Policy implications for developing economies
- Strategic implications for multinationals
- **Case Study:** BEPS 2.0 – Global Minimum Tax implementation outcomes

Training Methodology

- Interactive lectures and guided discussions
- Real-world case study analysis
- Group-based practical exercises
- Hands-on tax documentation and compliance simulations
- Policy interpretation and regulatory framework review
- Knowledge checks, Q&A sessions, and expert feedback

Register as a group from 3 participants for a Discount

Send us an email: info@fineskilltrainingcenter.org or call *+254769199797*

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 Fineskill Training Center account, as indicated in the invoice so as to enable us prepare better for you.

Upcoming Scheduled Sessions

Start Date	End Date	Location	Price
23 Nov 2026	27 Nov 2026	Online	$1,000

Start Date	End Date	Location	Price
23 Nov 2026	27 Nov 2026	Physical	$1,500
23 Nov 2026	27 Nov 2026	Physical	$3,000
23 Nov 2026	27 Nov 2026	Physical	$3,000
23 Nov 2026	27 Nov 2026	Physical	$6,000
23 Nov 2026	27 Nov 2026	Physical	$4,500
23 Nov 2026	27 Nov 2026	Physical	$6,000
23 Nov 2026	27 Nov 2026	Physical	$6,000

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