# Courseguide



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### Minor Treasury Management – Tax module

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### 1 Course Description

The focal point of the course are international tax issues related to tax and treasury management functions. It may serve as an introduction for an assistant treasurer or financial controllers job.

Emphasize will be on the following subjects.

In general: Advising on tax related issues of companies (corporates, larger SME, evt. listed) and non-profit organizations.

- Understanding basic tax rules
- Evaluating international corporate tax planning
- Analyzing a firms' tax position (also in an international perspective)
- Debating on tax ethics and tax evasion
- Understanding transfer pricing and other tax compliance schemes
- Discussing new plans on avoiding tax evasion (such as BEPS, digitax)

### 2 Course Goals and Learning Objectives

Purpose of the course is to extend knowledge and skills to students to successfully manage international tax management issues. Emphasize is on (strategic) tax planning, debating on tax ethics, tax planning instruments, tax compliance and the future for international tax rules.

We will use real life cases and guest lectures to evaluate and discuss the different subjects in order to make the learning effect as realistic as possible.

TABLE 1: LEARNING GOALS AND LEARNING OBJECTIVES

Learning Goals (Dublin Descriptor)	Associated General Learning Goals	Learning Objective fine tuned to the course	Assessment
<b>DD1:</b> Knowledge & Understanding	Student will recognize and understand the nature, the impact of and the concepts of tax management in a globalizing context.	Obtain knowledge on tax planning and tax compliance and its environment within the firm. Understanding the background of tax in international trading.  The workings of various taxation methods and the tax base and how to compute it.  The problems and issues involved in tax evasion, avoidance and profit shifting.	Paper and presenation
Knowledge Student will identify and apply the appropriate methods and tools to solve contemporary Rea		Problems and real life situation cases in which issues and dilemma's of international tax structures are exposed and evaluated.  Real life cases will be analysed and commented on.	Paper and presenation
DD3: Judgment	Student will evaluate and determine	Being able to oversee the solutions and alternatives to managing international	Paper and presenation

	responsible business decisions that impact on both organizational performance and society.	tax positions. Making responsible decisions in tax related choices. Understanding and applying tax compliance with new regulations coming in place.	
DD4: Communication	Student will be able to discuss, debate as well as provide convincing ideas to a variety of multicultural stakeholder groups.	Communicate the analysis made on problems and cases to his/her colleagues and to the instructor in a paper and in professional meetings.	Paper and presenation
<b>DD5:</b> Self-Direction	Student will be able to work autonomously and determine their own learning needs.	How to find relevant information using online resources. How to conduct an independent research of analyzing and evaluating the performance of some tax related matter. How to develop and deliver written and oral presentations and respond to different inquiries and questions.	Paper and presenation

#### 3 Place in the Curriculum and Related Courses

This practical course comes with the other minor courses; students should be able to understand balance sheets, profit- & loss accounts and cash flow statements on beforhand.

#### 4 Assessment

After completion of the 7 week term the final paper and presentation will be graded. To pass, the grade has to be at least a 5.5.

#### Assessment (2,5EC):

Write a paper and give a presentation with advice on developments in international taxation.

- The paper should include:
  - a. What is the issue, why is it a problem, what are the risks, who is involved?
  - b. Background, explanation of situation and history
  - c. What are the arguments pro and con?
  - d. What are the solutions and alternatives and for which situations?
  - e. What is the path forward?

Some examples for specific subjects are:

- a. Did Apple pay too little tax?
- b. Tax planning or tax ethics?
- c. Why The Netherlands is called a tax haven?
- d. What is the impact of BEPS?
- e. Why a digital tax plan?

The paper should have a maximum of 2500 words. The presentation is 15 minutes (excluding questions from the audience).

TABLE 3 SCORING RUBRIC PAPER

	Criteria	Weight
DD4	Overall Structure of the subject set  How well is the explanation of the issue structured in general? Does it make sense? Is it easy for the reader to follow what the students are doing?	10%
DD3	Structured and clear answer  Is your argumentation logical, clear and convincing? Are your arguments consistent?	30%
DD3	Presentation  Are the answers presented clearly?	20%
DD2	Analysis  Is the analysis correct? To what extent does the analysis deviate from the correct analysis?	40%

The paper is written in groups of two. In the exceptional case three students can work on one paper.

Group grades are assigned. If there is reason to suspect that individual group members do not actively or not sufficiently participate in assignments, the lecturer has the right to lower the grade for the respective person accordingly. The group can propose to the lecturer a differentiated score per group member based on member's contribution.

As this project invites to group-loyalty in order to obtain the full benefit of the project, being present and taking part in the lectures contribute to achieving a good grade. Absence and freeriding contribute to an insufficient grade and not passing the course.

The assignments will be graded based on the following criteria (not conclusive and assignment specific):

- Content
- Structure
- Correctness
- Analysis
- Argumentation
- Innovativeness
- Engagement
- Completeness
- Proposed solutions
- Persuasiveness
- Reasonability
- Referencing

Each group member has to present approximately for the same length as an other group member. The presentation will be graded on the following:

Criteria	Very poor (4)	Poor (5)	Sufficient (6)	Good (8)	Excellent (10)
<del></del>		(5)			(10)
Time Management	The presentation is		The presentation stays	The presentation is	
(10%	based on the set time		within the set time. The	within the set time	
	too long or too short.		speaker does not have	(not too short not too	
			to rush. The time could	long). The speaker	
			have been spread better	does not have to	
			over the various parts of	rush. The time is	
			the presentation.	spread well over the	
C + + (200()			<del>  </del>	various subjects.	
Content (30%)	The relevance is		Relevance is clear, goals	Relevance is clear, the	
	unclear, the goal is not		is clearly formulated.	goal is clearly	
	clearly defined. From		From the presentation it	formulated. From the	
	the presentation it		shows that the studente	presentation it shows	
	shows that the student		understand the outlines	that the student has a	
	has insufficient		of the sources used and	good understanding of	
	understanding of the		relevant terms but this	the used sources and	
	used sources.		could be better	relevant terms and is	
	Statements are not		formulated. Statements	able to formulate this	
	sufficiently supported		can be better supported	clearly. Statements are	
	by adequate arguments		by adequate arguments	supported by adequate	
	and relevant examples.		and relevant examples.	arguments and well	
				chosen examples.	
Structuring (20%	The structuring is		The structuring fits to	The structuring is logical	
	messy and/or does not		the purpose of the	and fits to he purpose of	
	serve the content. The		content. The	the content. The	
	presentation is hard to		presentation can be	presentation is easly to	
	follow.		followed, however the	follow. The steps in the	
			steps in the arguments can be made clearer.	arguments are clear.	
Presenting (20%)	Has little contact with		Makes contact with the	Makes good contact	
	the audience and		audience and is in	with the audience and	
	therefore struggles to		general able to keep the	knows how to keep the	
	keep the attention.		attention (e.g. by making	attention (e.g. by making	
	Hardly recovers from a		eye contact, body	eye contact, body	
	mistake. Does not		language, posture and	language, posture and	
	finetune the way of		speed of speech.	speed of speech.	
	presenting for the type		Recovers after making a	Recovers quick after	
	of audience and the		mistake and aligns the	making a mistake. The	
	situation.		way of presenting to the	way of presenting is	
			audience and situation.	aligned to the audience	
				and situation. Relevant	
				terms are used in a clear	
				and understandable	
				way.	
Respond to	Has difficulties to respond	1	Can answer most	Has convincing answers for	
questions (10%)	to questions. Does hardly		questions. Reacts on critical	most of the questions. Uses	
4	· ·		1 '	critical comments for a	
	react on and hardly reacts		comments.		
	on critical comments.			reflection on the	
				presentation.	

# 5 Work load

2.5 EC, being 70 hours workload:

- Instruction lectures

7 x 120 min. 14 hrs.

- Study materials 36 hrs.

Prepare and present draft and final paper
 20 hrs.

### 6 Pre-requisites

Three years of the bachelor program have to be completed successfully of Business Economics, Finance, Tax & Advice, Technical Business Management or comparable bachelor programs.

# 7 Exemption Possibilities

Not Applicable.

#### 8 Didactic Forms

The course consists out of lectures and work group meetings. The draft paper is reviewed by and discussed with a peer group. Presentation of the paper.

### 9 Student Activities

Subject to changes!

TABLE 2: SCHEDULE

Week	Subject	Preparation before class	In class activity	Deliverables
1 11 Nov	Kick-off	Create an account on: https://www.coursera.org/learn/international- taxation/home/welcome	Course introduction and explanation of assessment. Tax basics.	
2 18 Nov	What is the issue?	Watch The Debate: <a href="https://www.coursera.org/learn/international-taxation/lecture/0r8UL/the-debate">https://www.coursera.org/learn/international-taxation/lecture/0r8UL/the-debate</a> Why does Starbucks pay so little tax? - MoneyWeek Investment Tutorials <a href="https://www.youtube.com/watch?v=Th4fxMFRIt0">https://www.youtube.com/watch?v=Th4fxMFRIt0</a> The Netherlands: Worlds Biggest Tax Haven? <a href="https://www.youtube.com/watch?v=i0FOUR5x5Rg">https://www.youtube.com/watch?v=i0FOUR5x5Rg</a> Thin capitalization: <a href="https://www.youtube.com/watch?v=QEAqxlybxf8">https://www.youtube.com/watch?v=QEAqxlybxf8</a> https://www.theguardian.com/business/2019/sep/20/british-american-tobacco-issued-with-900m-dutch-tax-bill	Understanding the issue of international tax planning	Groups formed by Monday 23 Nov COB.
<b>3</b> 25 Nov	Guest lecturer	https://www.coursera.org/learn/international-taxation/lecture/Z6Dk0/taxable-base-rate-tax-havens-preferential-tax-regimes  https://www.coursera.org/learn/international-taxation/lecture/8hp77/background-key-stakeholders	Ruud Wieggers, International Tax Director Nutreco	Brainstorm on subject for paper. Deliver by Monday 30 Nov COB.

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		https://www.coursera.org/learn/international-taxation/lecture/XLpz4/introduction-base-case https://www.coursera.org/learn/international-taxation/lecture/wRSfc/introduction-to-transfer-pricing-and-why-it-is-important		
<b>4</b> 2 Dec	Case Apple	Read article Insead: Did Apply pay too little tax?	Discuss case Apple	One A4 with outline of paper incl. three articles and/or knowledge clips on the subject. Deliver Monday 7 Dec COB.
<b>5</b> 9 Dec	Way forward	https://www.coursera.org/lecture/international-taxation/the-oecd-the-eu-wjmCR https://www.oecd.org/tax/beps/ https://www.internationaltaxreview.com/article/b1ntym05qyfq5n/this-week-in-tax-oecd-and-un-digital-tax-proposals-released Read article:  How The Netherlands Became a Tax Haven for Multinationals Jan Vleggeert and Henk Vording	Discuss measures and way forward	Draft paper. Deliver by Monday 16 Dec COB to lecturer and peer group. Comment to peer group. Deliver by Tuesday 17 Dec COB.
6 18 Dec	Draft paper feedback	Review paper of peer group.	General feedback on draft papers. Q&A	Final paper: deliver by Monday 21 Dec 2021. Presentation: deliver by 6 Jan.
<b>7</b> 6 Jan 2021	Final paper, presenta tion and evaluati on	Final paper and presentation	Presentations of all groups	Evaluation course by 6 Jan.

#### Optional course material:

- News item PBS NewsHour How American companies change their address to avoid corporate taxes (2014).
   <u>Click here to watch</u>
- Corporate Tax Avoidance: How it happens, how it is changing, and what to do about it. https://www.youtube.com/watch?v=Ci bfP4DTMY
- VPRO documentary: https://www.dailymotion.com/video/x58fncw
- <a href="https://www.coursera.org/learn/international-taxation/supplement/34pQX/resources-media-on-the-international-tax-planning-debate">https://www.coursera.org/learn/international-taxation/supplement/34pQX/resources-media-on-the-international-tax-planning-debate</a>
- Sage Business Case: Apple Incorporated: European Commission Fines for Tax Evasion (A)
- https://www.internationaltaxreview.com/
- <a href="https://www.internationaltaxreview.com/article/b1ns2yq3r1dwkc/the-oecd-updates-digital-tax-plan-consensus-possible-by-mid2021">https://www.internationaltaxreview.com/article/b1ns2yq3r1dwkc/the-oecd-updates-digital-tax-plan-consensus-possible-by-mid2021</a>
- https://www.ey.com/en\_gl/tax-guides/worldwide-transfer-pricing-reference-guide-2020
- https://www.oecd.org/ctp/

### 10 Course Material and Literature

Case information and assignments; handouts; powerpoints

## 11 Course Evaluation

After completion of the course a written evaluation is conducted using the standard evaluation tool.