



THE CYPRUS INTERNATIONAL INSTITUTE OF MANAGEMENT
COURSE UNIT DESCRIPTION

Course Unit Title	Tax Transparency											
Course Unit Code	FL860											
Type of Unit	Elective											
Level of Course Unit	Second cycle											
Year of Study	First/second year											
Semester	On demand											
Number of ECTS Credits	3 ECTS											
Course Unit Objectives	<p>The objective of this course is to analyze international tax transparency under the current standards-driven by OECD and EU law.</p> <p>Tax transparency requires public and private institutions (financial institutions, trustees, tax advisors) to disclose tax-related information, exchanged between tax administrations. Different methods are made available for this purpose: notably the automatic, upon request and spontaneous exchange of information. Adding, tax administrations have other techniques at their disposal, to conduct simultaneous examinations, offshore tax exams, and in more delicate cases, exchange industry-wide information.</p> <p>The personal scope of the legislation expands, to cover both individuals and corporations. The provisions provide for the exchange of bank account information, named types of revenues, tax rulings, advance pricing arrangements, and planning. The exchanged information relates to past and forecast future events-foreseeably affecting the taxpayer's position. The provisions are triggered as regards tax liability in different states or if issues under anti-money laundering audits arise. EU external strategy for Effective taxation propulses the standard to third countries, crucially increasing the compliance costs borne by corporations.</p> <p>The approach suggested delivers a systematic and comprehensive tool to domestic implantation rules, enacted by Tax and Regulatory authorities. By the end of the course, students are expected to master compliance standards driven by tax transparency rules, detect legal risks related to international standards circumventions (beneficial ownership and anti-money laundering), and proactively fashion their tax strategy in a consistent way, on a case by case basis.</p>											
Learning Outcomes	<p>On completion of this course students are expected to:</p> <table border="1"> <tr> <td>CILO 1</td> <td>Master the Directives on Administrative Cooperation (DAC, 1-6).</td> </tr> <tr> <td>CILO 2</td> <td>Master the Mutual Administrative Assistance in Tax Matters Convention</td> </tr> <tr> <td>CILO 3</td> <td>Master the CRS and CbC Multilateral Competent Authority Agreement</td> </tr> <tr> <td>CILO 4</td> <td>Secure compliant positions on Reporting (CbC, CRS) via online tools</td> </tr> <tr> <td>CILO 5</td> <td>Kept abreast of developments on the field</td> </tr> </table>		CILO 1	Master the Directives on Administrative Cooperation (DAC, 1-6).	CILO 2	Master the Mutual Administrative Assistance in Tax Matters Convention	CILO 3	Master the CRS and CbC Multilateral Competent Authority Agreement	CILO 4	Secure compliant positions on Reporting (CbC, CRS) via online tools	CILO 5	Kept abreast of developments on the field
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Name of Lecturer(s)	Dr. Eleni Apostolidou											
Mode of delivery	Face to Face											
Prerequisites or corequisites	None											
Course Content	<table border="1"> <tr> <td>Exchange of info of individuals (DAC, Beneficial ownership, Trust)</td> <td>CILO 1, 2</td> </tr> <tr> <td>Exchange of info for corporations (DAC, CbC, CRS)</td> <td>CILO 3,4</td> </tr> <tr> <td>MAC and EU third country agreements</td> <td>CILO 4,5</td> </tr> <tr> <td>Cyprus legal challenges (citizenships, Beneficial owner)</td> <td>CILO 5</td> </tr> <tr> <td>Tax payers' rights (retroactivity, legal advice, privacy, data collection)</td> <td>CILO 5</td> </tr> </table>		Exchange of info of individuals (DAC, Beneficial ownership, Trust)	CILO 1, 2	Exchange of info for corporations (DAC, CbC, CRS)	CILO 3,4	MAC and EU third country agreements	CILO 4,5	Cyprus legal challenges (citizenships, Beneficial owner)	CILO 5	Tax payers' rights (retroactivity, legal advice, privacy, data collection)	CILO 5
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Recommended or required reading	<p><u>Textbooks:</u> José Manuel Almudí Cid, Jorge A. Ferreras Gutiérrez, Pablo A. Hernández González-Barreda, Combating Tax Avoidance in the EU, EUCOTAX Series on European Taxation, 2018 (required).</p> <p><u>Optional textbook:</u> Tax Transparency: 2018 EATLP Congress Zürich, 7-9 June 2018, Volume 17 de EATLP international tax series, ISSN 1574-9789.</p>											

	<p><u>Articles & Journals:</u></p> <p>V. Wöhrer, Preface in Data Protection and Taxpayers’ Rights: Challenges Created by Automatic Exchange of Information (IBFD 2018), Online Books IBFD (accessed 13 Sep. 2019).</p> <p>J.C. Wheeler, Foreword in Single Taxation? (J.C. Wheeler ed., IBFD 2018), Online Books IBFD (accessed 13 Sep. 2019).</p> <p>D. (Dennis) Weber, Preface in EU Law and the Building of Global Supranational Tax Law: EU BEPS and State Aid (D. (Dennis) Weber ed., IBFD 2017), Online Books IBFD (accessed 13 Sep. 2019).</p> <p>K. Dziwiński, Chapter 6: Dual Residence and Treaty Entitlement of Individuals in Tax Treaty Entitlement (M. Lang et al. eds., IBFD 2015), Online Books IBFD (accessed 13 Sep. 2019).</p> <p>P. Bräumann, Chapter 7: Dual Residence for Non-Individuals in Tax Treaty Entitlement (M. Lang et al. eds., IBFD 2015), Online Books IBFD (accessed 13 Sep. 2019).</p> <p>. Turina, “Visible, Though Not Visible in Itself”. Transparency at the Crossroads of International Financial Regulation and International Taxation, 8 World Tax J. (2016), Journals IBFD (accessed 13 Sep. 2019).</p> <p>N. Čičin-Šain, New Mandatory Disclosure Rules for Tax Intermediaries and Taxpayers in the European Union – Another “Bite” into the Rights of the Taxpayer?, 11 World Tax J. (2019), Journals IBFD (accessed 13 Sep. 2019).</p> <p><u>Online sources:</u></p> <p>https://www.oecd.org/tax/transparency/</p> <p>https://ec.europa.eu/taxation_customs/business/tax-cooperation-control/administrative-cooperation/enhanced-administrative-cooperation-field-direct-taxation_en</p> <p>https://www.mof.gov.cy/mof/tax/taxdep.nsf/page20_en/page20_en?opendocument</p>
Planned learning activities and teaching methods	Lectures; in-class discussion and debates; in-class exercises; problem sets; team work; team presentations, interactive online learning, use of online tools for reporting.
Assessment methods and criteria	Essay, Final exam.
Language of Instruction	English
Work Placement(s)	Not applicable