



# Gulf tax courses

---

SHARPEN YOUR TECHNICAL SKILLS

**AURIFER**

# AT AURIFER, WE PRIDE OURSELVES IN OUR TRAINING SKILLS.

Our team of experts has extensive tax training experience in multiple jurisdictions, having provided training on a professional and an academic level. We offer both general training, and sector-specific training. We also provide your business with tailored in-house training.

Get in touch via [training@aurifer.tax](mailto:training@aurifer.tax)



AURIFER



In this brochure, we offer:

- Short term basic and advanced indirect tax and direct tax courses
- Long term basic and advanced courses on VAT

Any lawyer, tax expert, accountant, financial manager or director with an interest in tax should attend these courses.

Attendees will be provided with an attendance certificate and will receive a copy of all course material. Get in touch to confirm whether the course grants you credits towards your relevant professional body. All courses can be facilitated in Arabic as well.

Check [www.aurifer.tax](http://www.aurifer.tax) for our planning or get in touch via [training@aurifer.tax](mailto:training@aurifer.tax) if you are interested in one of the offered courses.

Aurifer is a Dubai Legal Affairs Accredited trainer, facilitates courses at the IBFD, DIFC Academy of Law, via Lexis Nexis and lectures at the Paris Sorbonne Abu Dhabi University. Aurifer also co-organizes the first and only comprehensive tax certificate course in the GCC, along with Middlesex University, Dubai. Aurifer is an accredited tax agency with the UAE's Federal Tax Authority. Aurifer is a member of the Global Legal Customs Association (GLCA). It is based in Dubai and Riyadh and has an office in Brussels (Belgium).

# SUMMARY

## SHORT TERM INDIRECT TAX COURSES

1 - UAE VAT law basics .....	06
2 - UAE VAT Return .....	07
3 - UAE VAT procedures .....	08
4 - KSA VAT law basics .....	09
5 - Bahrain VAT law basics .....	10
6 - Customs law and procedures in the GCC .....	11
7 - Managing and mitigating risks under Incoterms .....	12
8 - UAE and GCC VAT for the Real Estate and Construction Sector .....	13
9 - UAE and GCC VAT for the Financial Sector .....	14
10 - UAE and GCC VAT for the Logistic Sector .....	15
11 - UAE and GCC VAT for the Retail Sector .....	16
12 - UAE and GCC VAT for Law firms .....	17
13 - UAE and GCC VAT for the Healthcare sector .....	18
14 - Accounts payable UAE VAT training .....	19

## SHORT TERM DIRECT TAX COURSES

15 – CIT in the UAE .....	21
16 – M&A and Tax .....	22
17 - Withholding Taxes .....	23
18 - Double Tax Treaties .....	24
19 - OECD BEPS 2.0 Pillar Two .....	25
20 - Introduction to domestic tax systems in the GCC .....	26
21 - Accounting for Zakat in KSA .....	27
22 - Tax in KSA .....	28
23 - Transfer Pricing rules in the GCC .....	29
24 - Transfer Pricing in KSA .....	30

## LONG TERM VAT COURSES

25 - GCC VAT programme .....	32
26 - UAE VAT programme .....	34



# SHORT TERM INDIRECT TAX COURSES

# UAE VAT law basics

This training provides an overview of the VAT legislation in the UAE. It covers the VAT laws and Executive regulations, as well as the Federal Tax Procedures Law and its Executive Regulations.

It explains basic concepts such as which businesses need to register for VAT in the UAE, whether UAE VAT needs to be charged or not on certain transactions, who is liable for the payment of VAT, how to invoice and how to correctly report transactions.

The training applies for all types of businesses active in the UAE across all sectors.



## Length of workshop and mode of study

---

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

---

### 1 Background

- 1.1 Why is VAT being implemented
- 1.2 Impact of VAT on the GCC economy
- 1.3 Current status in the GCC

### 2 VAT principles

- 2.1 What is VAT
- 2.2 How does VAT work
- 2.3 Taxable person
- 2.4 Taxable supplies
- 2.5 Place of supply
- 2.6 Date of supply
- 2.7 Taxable base
- 2.8 VAT Rates (including zero-rates and exemptions)
- 2.9 VAT liability

### 3 VAT Obligations

- 3.1 Registration and group registration
- 3.2 (Simplified) Invoicing and Accounting
- 3.3 Input VAT deduction
- 3.4 Submitting VAT Returns
- 3.5 Corrections
- 3.6 Audit procedures

This training helps the audience to develop the necessary expertise and understanding of filing the UAE VAT return. This will reduce the risk of exposure to VAT liabilities and penalties.

The training will primarily focus on the VAT return and will cover the possible transactions and the manner in which they need to be reported. The training will also touch upon the scope of VAT and VAT administration.

Practical examples will be given of typical transactions of a UAE business. We will also analyze purchase and sales transactions, qualify them for VAT purposes and prescribe the appropriate reporting of these transactions.

The training applies for all types of businesses active in the UAE across all sectors. It focuses specifically on the compliance and reporting obligations of UAE businesses.



## Length of workshop and mode of study

---

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

---

### 1 Understanding VAT

- 1.1. What is VAT
- 1.2. How does VAT work
- 1.3. Scope of VAT
  - 1.3.1. Which transactions are subject to VAT
  - 1.3.2. Where do the transactions take place
  - 1.3.3. When is VAT charged
- 1.4. Zero rated/Exempt/Out of scope supplies
- 1.5. Who pays VAT to the Government

### 2 VAT Reporting

- 2.1. VAT on sales and all other outputs
- 2.2. VAT on expenses and all other inputs
  - 2.2.1. Conditions for exercising right of input deduction
  - 2.2.2. Restrictions on input VAT deduction
  - 2.2.3. Proportional deduction
- 2.4. Payment of VAT
- 2.5. Amending a tax return
- 2.6. Procedure for claiming a refund

### 3 VAT Administration

- 3.1. Record Keeping and retention
- 3.2. Penalties

# 3 UAE VAT procedures

This course is an introduction to the procedural aspects of dealing with the UAE Federal Tax Authority. The course provides practical knowledge of the day-to-day practices based on the tax procedures law and its regulations.

The attendants will have the opportunity to analyze in depth administrative penalties, administrative appeals, tax collection, tax crimes, refund claims, the filing of the VAT returns, clarification requests, the statute of limitation and assessments.

The training applies for all types of businesses active in the UAE across all sectors. It focuses specifically on conflicts with the UAE's Federal Tax Authority.



## Length of workshop and mode of study

---

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

---

### 1 Obligations

- 1.1 Registration
- 1.2 Tax returns
- 1.3 Payment
- 1.4 Record keeping

### 2 Audits

- 2.1 How it works
- 2.2 Results
- 2.3 Administrative penalties
- 2.4 Time frame and lapse of time

### 3 Tax evasion

- 3.1 What the law says
- 3.2 Situations
- 3.3 Penalties
- 3.4 Statute of limitations

### 4 Corrections

- 4.1 How to correct the VAT return
  - 4.1.1 Voluntary disclosure
  - 4.1.2 Correction in the subsequent VAT return
- 4.2 Amending the VAT registration

### 5 Objections

- 5.1 Reconsiderations
- 5.2 Appeals
- 5.3 Litigation

### 6 General

- 6.1 Clarification request
- 6.2 Professional confidentiality
- 6.3 Time limit for tax obligation and calculation

This training provides an overview of the VAT legislation in the KSA. It explains basic concepts such as which businesses need to register for VAT in the KSA, whether KSA VAT needs to be charged or not on transactions, who is liable for the payment of VAT, how to invoice and how to specifically report transactions.

The training applies for all types of businesses active in KSA across all sectors.



## Length of workshop and mode of study

---

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

---

### 1 Background

- 1.1 Why is VAT being implemented
- 1.2 Impact of VAT on the GCC economy
- 1.3 Current status in the GCC

### 2 VAT principles

- 2.1 What is VAT
- 2.2 How does VAT work
- 2.3 Taxable person
- 2.4 Taxable supplies
- 2.5 Place of supply
- 2.6 Date of supply
- 2.7 Taxable base
- 2.8 VAT Rates (including zero-rates and exemptions)
- 2.9 VAT liability

### 3 VAT Obligations

- 3.1 Registration and group registration
- 3.2 (Simplified) Invoicing and Accounting
- 3.3 Input VAT deduction
- 3.4 Submitting VAT Returns
- 3.5 Corrections
- 3.6 Audit procedures

# 5 Bahrain VAT law basics

This training provides an overview of the VAT legislation in Bahrain. It explains basic concepts such as which businesses need to register for VAT in Bahrain, whether Bahraini VAT needs to be charged or not on transactions, who is liable for the payment of VAT, how to invoice and how to specifically report transactions.

With this training the applicant will learn all about the published VAT law, how to register for VAT, what the impact is on transactions with other GCC countries and how to prepare for the introduction of the new tax.

The training applies for all types of businesses active in Bahrain across all sectors.



## Length of workshop and mode of study

---

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

---

### 1 Background

- 1.1 Why is VAT being implemented
- 1.2 Impact of VAT on the GCC economy
- 1.3 Current status in the GCC

### 2 VAT principles

- 2.1 What is VAT
- 2.2 How does VAT work
- 2.3 Taxable person
- 2.4 Taxable supplies
- 2.5 Place of supply
- 2.6 Date of supply
- 2.7 Taxable base
- 2.8 VAT rates, including zero-rates and exemptions
- 2.9 VAT liability

### 3 VAT Obligations

- 3.1 Registration and group registration
- 3.2 Simplified invoicing and accounting
- 3.3 Input VAT deduction
- 3.4 Submitting VAT Returns
- 3.5 Corrections
- 3.6 Audit procedures

# Customs law and procedures in the GCC

This training will provide an overview of the legal and regulatory procedures involved in importing goods in the GCC and Dubai (UAE). The attendants will receive valuable insight into the importation, release, and accounting of goods admitted into the GCC and the UAE.

By the end of the 3-hour training period, delegates will have a broader and more in-depth understanding of how customs law and principles are applied globally, regionally and within the UAE.

The training applies for all types of businesses active in the GCC across all sectors which trade goods.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 4 hours.



## Course content

### 1 Global Customs and Trade Principles / Practices

- 1.1 World Customs Organization
- 1.2 Harmonized system (HS) (Principles, application)
- 1.3 Revised Kyoto convention (Customs) and the foundation of Modern Customs

### 2 Calculation of customs duties

- 2.1. Calculation formula
- 2.2 What is classification?
  - 2.2.2 Importance of classification
- 2.3 Introduction to valuation
  - 2.3.1 What is valuation?
  - 2.3.2 Importance of valuation
- 2.4 Introduction to origin
  - 2.4.1 What is origin? Different types of origin
    - 2.4.1.1 Non-preferential origin
    - 2.4.1.2 Preferential origin
  - 2.4.2 Importance of origin.

### 3 Regional GCC and UAE Principles / Practices

- 3.1 GCC Customs code
- 3.2 Customs processes and procedures
- 3.3 Free zones
- 3.4 VAT from a customs perspective
- 3.5 Anti dumping measures

### 4 Customs procedures

- 4.1 Introduction
- 4.2 Bonded and Customs Warehousing
- 4.3 Duty drawback, Suspension schemes and Temporary Admission
- 4.4 Free zones
- 4.5 Transit Rules on the placing of goods under a customs procedure

# Managing and mitigating risks under Incoterms

This course is designed to help exporters understand Incoterms® - International Commercial Terms - and how to select the most appropriate one for their international transactions. During the course, the benefits of using the right Incoterms® will be highlighted both from an operational and commercial point of view to mitigate the risk and responsibility between the buyers and the seller.



## Length of workshop and mode of study

---

This is an in-person half-day workshop lasting approximately 2 hours.



## Course content

---

### 1 General introduction to incoterms

- 1.1 Rationale for using incoterms
- 1.2 Developments and changes to the incoterms framework
- 1.3 Differentiating incoterms
- 1.4 Classification on the basis of risk and title transfer
- 1.5 Seller delivery obligations

### 2 Impact of incoterms on legal obligations

- 2.1 Incoterms and revenue recognition
  - 2.1.1 UAE accounting standards
  - 2.1.2 Relevance of incoterms in revenue recognition
- 2.2 Documents, duties and bonds related to incoterms
  - 2.2.1 Customs legislation
  - 2.2.2 Documents and incoterms
  - 2.2.3 Calculation customs duties
- 2.3 Incoterms and VAT
  - 2.3.1 Importation and registration
  - 2.3.2 Payment of duties and taxes
  - 2.3.3 Customs suspension

# UAE and GCC VAT for the Real Estate and Construction Sector

The real estate and construction sector is one of the most important sectors in Dubai and by extension the UAE. World Expo 2020 will also provide a boost in infrastructure spending and generally to the UAE.

This training looks at the specific way VAT applies to the real estate and construction sector, looking at it from the perspective of all relevant stakeholders. It analyses the VAT liability of real estate businesses and explains when the rent or sale is taxed, exempt or out of the scope of VAT. It also focuses on long term contracts, retentions, and the long supply chains associated with landmark projects.

In addition, it pays specific attention to how partial exemptions apply in the real estate sector and the difficulties business face when applying it.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Background

- 1.1 Why is VAT being implemented
- 1.2 Impact of VAT on the GCC economy
- 1.3 Current status in the GCC

### 2 VAT principles

- 2.1 What is VAT
- 2.2 How does VAT work
- 2.3 Taxable person
- 2.4 Taxable supplies
- 2.5 Place of supply
- 2.6 Date of supply
- 2.7 Taxable base
- 2.8 VAT Rates (including zero-rates and exemptions)
- 2.9 VAT liability

### 3 VAT Obligations

- 3.1 Registration and group registration
- 3.2 Invoicing and Accounting
- 3.3 Input VAT deduction
  - 3.3.1. Attribution of input tax for mixed taxable persons
  - 3.3.2. Calculation of residual input tax
  - 3.3.3. The annual wash up calculation
- 3.4 Capital Assets Scheme
- 3.5 Submitting VAT Returns
- 3.6 Audit procedures

### 4 The impact of VAT on the Real Estate sector

- 4.1 Construction, development and renovation
- 4.2 Sale of real estate
  - 4.2.1 Supply of bare land
  - 4.2.2 Supply of "new" buildings (< 3 years)
  - 4.2.3 Supply of "old" buildings (> 3 years)
- 4.3 Purchase of real estate
- 4.4 Renting of real estate
  - 4.4.1 Commercial and retail rent
  - 4.4.2 Residential rent

The VAT treatment of the financial sector is particularly complex due to its limited VAT recovery and specific obligations imposed on it. Its limited input VAT recovery means that it is faced with complex annual wash up calculations. This training pays specific attention to how partial exemptions apply in the Financial sector and the difficulties business face when applying it.

In addition, we will discuss in detail the positions taken by the UAE in its financial services sector guide.

Outsourcing of financial services often comes at a VAT cost. We look at mitigating strategies to limit these costs, such as VAT grouping. Expenses between branches and head offices are also subject to a special regime. This training will help the attendees to understand the implication of VAT on this complex sector.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Background

- 1.1 Why is VAT being implemented
- 1.2 Impact of VAT on the GCC economy
- 1.3 Current status in the GCC

### 2 VAT principles

- 2.1 What is VAT
- 2.2 How does VAT work
- 2.3 Taxable person
- 2.4 Taxable supplies
- 2.5 Place of supply
- 2.6 Date of supply
- 2.7 Taxable base
- 2.8 VAT Rates (including zero-rates and exemptions)
- 2.9 VAT liability

### 3 VAT Obligations

- 3.1 Registration and group registration
- 3.2 Invoicing and Accounting
- 3.3 Input VAT deduction
  - 3.3.1. Attribution of input tax for mixed taxable persons
  - 3.3.2. Calculation of residual input tax
  - 3.3.3. The annual wash up calculation
- 3.4 Capital Assets Scheme
- 3.5 Submitting VAT Returns
- 3.6 Audit procedures

### 4 The complexity of the Financial Sector

- 4.1 Different types of transactions
  - 4.1.1 Taxable transactions
    - 4.1.1.1. Standard rated transactions
    - 4.1.1.2. Zero rated transactions
  - 4.1.2 Exempt transactions
  - 4.1.3 Out of scope
- 4.2 Mixed status of companies active in the financial sector
- 4.3 Islamic Finance

The UAE is the logistical and transport hub of the region. Due to the particular nature of the customs framework of the GCC and the way that VAT ties into that framework, logistics companies face challenges in qualifying the supply chain for VAT purposes. The processes logistics companies are using and the proof they hold to show where goods came from and where they go to have particular relevance.

Due to the specific link of VAT with the Customs legislation, it is also necessary to look into some of the basic mechanics of the determination of customs duties.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Background

- 1.1 Why is VAT being implemented
- 1.2 Impact of VAT on the GCC economy
- 1.3 Current status in the GCC

### 2 GCC Common Customs Law

- 2.1 Background of the GCC Customs Union
- 2.2 Key features of the GCC Customs Union
- 2.3 Basic legislative framework
- 2.4 Mechanics of customs duty determination
- 2.5 Interaction of customs with VAT

### 3 VAT principles

- 3.1 What is VAT
- 3.2 How does VAT work
- 3.3 Taxable person
- 3.4 Taxable supplies
- 3.5 Place of supply
- 3.6 Date of supply
- 3.7 Taxable base
- 3.8 VAT Rates (including zero-rates and exemptions)
- 3.9 VAT liability

### 4 VAT obligations

- 4.1 Registration and group registration
- 4.2 Invoicing and Accounting
- 4.3 Input VAT deduction
- 4.4 Submitting VAT Returns
- 4.5 Audit procedures

### 5 Role of Logistics in VAT

- 5.1 Import and Export
- 5.2 Special customs regimes
- 5.3 Designated zones
- 5.4 Incoterms

The retail sector is one of the largest and most important sectors in the UAE. Dubai is the most populated Emirate and hosts the most important urban centers with easy access to shopping malls. Abu Dhabi comes a close second with important shopping malls and recreation parks having been built or being constructed. In addition, in all Emirates important hotels and entertainment complexes receive many visitors.

The retail sector deals with a lot of B2C transactions, has sometimes complicated arrangements with distributors and has flexible rental agreements which compensation is sometimes defined depending on the turnover of the shops. Large new construction projects can be challenging in terms of the management of their supply chain from a VAT perspective.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Background

- 1.1 Why is VAT being implemented
- 1.2 Impact of VAT on the GCC economy
- 1.3 Current status in the GCC

### 2 VAT principles

- 2.1 What is VAT
- 2.2 How does VAT work
- 2.3 Taxable person
- 2.4 Taxable supplies
- 2.5 Place of supply
- 2.6 Date of supply
- 2.7 Taxable base
- 2.8 VAT Rates (including zero-rates and exemptions)
- 2.9 VAT liability

### 3 VAT Obligations

- 3.1 Registration and group registration
- 3.2 Invoicing and Accounting
- 3.3 Input VAT deduction
- 3.4 Submitting VAT Returns
- 3.5 Audit procedures

### 4 Challenges of the Retail Sector

- 4.1 e-Commerce
- 4.2 Promotional schemes and sales
- 4.3 Franchising contracts
- 4.4 Supply chain and procurement considerations
- 4.5 Hotels, restaurants and amusement parks

This training analyses how law firms are impacted by VAT. Because of the unique way in which they operate, they are faced with specific issues. The VAT treatment of disbursements is one example, since firms often advance expenses in the name and on behalf of their clients. Inter-firm billing is another practical hurdle, as well as the possibility of having foreign fixed establishments. VAT has an important impact on working capital. The training will also analyze what the VAT status is of the customers and vendors.

The course will be presented in a workshop format and is an intensive course specifically for lawyers designed to promote learning, discussion, and feedback about the VAT implementation in the UAE.

The workshop provides a high-yield, interactive and educational experience. It is intended for lawyers and finance professionals employed by law firms in the UAE. It allows for networking with colleagues from the same field and especially ensure the lawyers working in the UAE are ready to face the challenges that arise in their practice after the implementation of VAT in January 2018.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Background

- 1.1 Why is VAT being implemented
- 1.2 Impact of VAT on the GCC economy
- 1.3 Current status in the GCC

### 2 VAT principles

- 2.1 What is VAT
- 2.2 How does VAT work
- 2.3 Taxable person
- 2.4 Taxable supplies
- 2.5 Place of supply
- 2.6 Date of supply
- 2.7 Taxable base
- 2.8 VAT Rates (including zero-rates and exemptions)
- 2.9 VAT liability

### 3 VAT obligations

- 3.1 Registration and group registration
- 3.2 Invoicing and Accounting
- 3.3 Input VAT deduction
- 3.4 Submitting VAT Returns
- 3.5 Audit procedures

The healthcare sector is a very special sector in the GCC, subject to strict rules. Prescribed healthcare services are traditionally exempt from VAT while in the UAE they are largely zero-rated.

Even though the zero rate is applicable, many other related services will be subject to VAT (e.g., cosmetic surgery, traditional and alternative medicines, rooms and food provided to non-patients).

This course will highlight the impact of VAT on the healthcare sector while it also takes the attendants through practical issues faced by the sector for all stakeholders: pharmaceutical companies, distributors, hospitals and private doctors.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Background

- 1.1 Why is VAT being implemented
- 1.2 Impact of VAT on the GCC economy
- 1.3 Current status in the GCC

### 2 VAT principles

- 2.1 What is VAT
- 2.2 How does VAT work
- 2.3 Taxable person
- 2.4 Taxable supplies
- 2.5 Place of supply
- 2.6 Date of supply
- 2.7 Taxable base
- 2.8 VAT Rates (including zero-rates and exemptions)
- 2.9 VAT liability

### 3 VAT treatment of hospitals and medical supplies

- 3.1 VAT treatment of healthcare services and medical supplies in the UAE
- 3.2 Supply of services related to medical equipments and supplies

### 4 Practical issues

- 4.1 VAT treatment with respect to the supply chain
- 4.2 Role of agents in the distribution
- 4.3 Refreshment of consignment stocks
- 4.4 Hospital construction projects
- 4.5 Clinical trials

# Accounts payable UAE VAT training

The goal of this training is to provide insights on how VAT works and how it affects the company's purchasing processes. The training is given in the form of an interactive presentation and will consist of two parts. During the first part, we will focus on the basic principles of VAT.

In the second part, we will consider the core processes affected by VAT, the financial consequences on the accounts payable of the company and the deductibility of the company's expenses.

The training applies for all types of businesses active in the UAE across all sectors.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Understanding VAT

- 1.1 Current status in the UAE and GCC
- 1.2 How does VAT work
- 1.3 Scope of VAT
  - 1.3.1 Taxable person
  - 1.3.2 Taxable supplies
  - 1.3.3 Place of supply
  - 1.3.4 Date of supply
  - 1.3.5 Taxable base
  - 1.3.6 VAT Rates (including zero-rates and exemptions)
- 1.3.5 VAT liability

### 2 Accounts payable VAT considerations

- 2.1 Overview of possible incoming transactions: applicable VAT treatment and VAT reporting
  - 2.1.1 Purchases from local suppliers
  - 2.1.2 Purchases from designated zones suppliers
  - 2.1.3 Purchase of services from foreign suppliers
    - 2.1.3.1 Special rules
  - 2.1.4 Import of goods
    - 2.1.4.1 Import documents and the reverse charge mechanism
    - 2.1.4.2 Import through freight agent
- 2.2 Purchase invoices (Invoice requirements)
- 2.3 Conditions for exercising right of input VAT deduction
- 2.4 Blocked expenses
- 2.5 Proportional deduction

### 3 VAT Obligations

- 3.1 Registration and group registration
- 3.2 Invoicing and Accounting
- 3.3 Submitting VAT Returns
- 3.4 Refund procedure
- 3.5 Record keeping
- 3.6 Payment of VAT



# SHORT TERM DIRECT TAX COURSES

The UAE is all set to launch the Corporate Income Tax (CIT) regime for periods starting June 2023. This will have major impact in nearly every sector and every type of business model. Given that the UAE is a very international jurisdiction, the upcoming regime would also have deep impact on Free Zone entities.

As per the information available as on date, the UAE has ensured that their tax policies are as business friendly as possible, while adhering to international best practices.

This advanced course will focus on the nuances of the CT regime provided in the Public Consultation Document, and, when released, the draft CIT law.

The training applies for all types of businesses domestically in the UAE and internationally and across almost all sectors.



## Length of workshop and mode of study

---

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

---

### 1 Background

- 1.1 Origins Why is CT being implemented?
- 1.2 Impact of CT on the UAE economy
- 1.3 Current Status of CT in the UAE and beyond

### 2 CT Principles

- 2.1 What is CT?
- 2.2 How does CT work?
- 2.3 Taxable persons
- 2.4 Basis of taxation
- 2.5 Calculation of taxable income
- 2.6 Free zones

### 3 Other aspects of the CT law

- 3.1 Groups
- 3.2 Transfer Pricing
- 3.3 Calculation of CT liability
- 3.4 International Tax Developments
- 3.5 Administrative issues

Managing tax consequences is usually the most crucial aspect of any merger or acquisition transaction. It provides an opportunity to seize many tax benefits that can lead to significant financial savings. M&A Tax planning has become all the more important in the Gulf regions, as countries take more interest in sophisticating their tax systems.

This advanced course will focus on the steps involved in preparation of a typical M&A transaction, and the tax implications on positions taken by the parties.

The training applies for all types of businesses that have operations in the Gulf and are looking for new investors, more efficient ways of operating, or preparing in light of any legal or regulatory changes in their respective countries.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Overview

- 1.1 Introductory remarks
- 1.2 Definitions

### 2 Main reorganization schemes:

- 2.1 Statutory merger
- 2.2 Quasi-merger
- 2.3 Demerger
- 2.4 Spin-off
- 2.5 Share sales and asset sales
- 2.6 Other schemes

### 3 M&A phases / planning:

- 3.1 Step 1: Strategy & identification of targets
- 3.2 Step 2: Preliminary contact
- 3.3 Step 3: Exploring the opportunity
- 3.4 Step 4: Negotiation & due diligence
- 3.5 Step 5: Final negotiation & closing
- 3.6 Step 6: Integration

### 4 Tax treatment of transactions:

- 4.1 Share deal v Asset Deal (advantage / disadvantage of each)
- 4.2 Share deal v Asset Deal (UAE tax implications)

### 5 Managing tax risks in an M&A transaction

- 5.1 Representations and warranties.
- 5.2 Optimizing return on investment:
  - 5.2.1 Ensuring availability of treaty benefits
  - 5.2.2 Ensuring compliance with anti-avoidance rules
  - 5.2.3 Eligibility of carry forward of losses
  - 5.2.4 Coverage of indemnity agreements

# Withholding Taxes

Managing withholding taxes is one of the core tasks of tax managers and in-house finance professionals. While the UAE envisages a 0% withholding for now, other Gulf countries do have source withholding systems. Studying the transaction, examining the parties involved, and engineering optimal tax planning activities is crucial for a company's management of cash flow management and effective tax rate. Join us in this training to learn what withholding taxes are, how treaty withholding rates play with the domestic rates, and how to ensure availability of treaty benefits.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Concept of Withholding Taxes (WHT)

- 1.1 What is WHT?
- 1.2 Purpose of WHT
- 1.3 Country Examples

### 2 Double Taxation

- 2.1 What is Double Taxation?

### 3 Double Taxation Treaties

- 3.1 Role of DTTs
- 3.2 Objectives of DTTs
- 3.3 How DTTs Work
  - DTTs' modus operandi
  - Distribution Rules
  - Some examples of Distributive Rules

### 4 Double Taxation Relief

- 4.1 General Methods of Double Taxation Relief
  - Exemption Method
  - Deduction Method
  - Credit Method
- 4.2 Granting DTT benefits
- 4.3 Treaty Effects
  - UAE - KSA Treaty

### 5 International Tax Planning Strategies

- 5.1 Multilateral Instrument (MLI) and Principal Purpose Test (PPT)
  - MLI
  - Effects of MLI
  - Prevention of Treaty Abuse - Article 7
  - GCC positions on PPT
- 5.2 What is substance?
  - Different Perspectives - Physical Presence or Economic Activities
  - Importance of Substance in International Tax Planning
  - Substance and General Anti-Avoidance Rules
  - Substance and Specific Anti-Avoidance Rules
  - Substance and International Tax Laws
  - What type and how much substance?

Double Tax Treaties (DTT) are signed between countries to bolster economic relations, prevent double taxation and to prevent tax evasion. Today, there are more than 3,000 DTTs in force, with the UAE having signed around 130 DTTs. The Gulf countries being so internationally oriented render DTTs crucial to tax planning activities of businesses earning cross border income. Discover the nature of DTTs, allocation of income to States under DTTs, dispute resolution processes, anti-abuse safeguards and more in this training.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Mechanics, Introduction, and Interpretation of International Tax Law

- 1.1 Mechanics of International Tax Law
- 1.2 Sources of International Tax Law
- 1.3 Introduction to DTTs
- 1.4 Interpretation of DTTs
- 1.5 Tax Residency
- 1.6 Introduction to the 'Allocative Rules'

### 2 Treaty provisions (Active Income)

- 2.1 Active v/s. Passive Income
- 2.2 Business Profits
- 2.3 Income from Immovable Property
- 2.4 Other income

### 3 Treaty provisions (passive income)

- 3.1 Dividends
- 3.2 Interest
- 3.3 Royalties
- 3.4 Capital Gains

### 4 Associated Enterprises / Transfer Pricing

- 4.1 What is Transfer Pricing?
- 4.2 OECD Transfer Pricing Guidelines
- 4.3 Typical Transfer Pricing Analysis

### 5 Methods of Avoiding Double Taxation

- 5.1 Methods under DTTs (Exemption and Credit method) and under Domestic law (Unilateral Foreign Tax Credit and Deduction)

### 6 Miscellaneous Provisions

- 6.1 Non-Discrimination
- 6.2 Exchange of Information / Transparency
- 6.3 Mutual Agreement Procedures

### 7 Countering Improper Use of Tax Treaties

- 7.1 Tax Evasion v. Tax Avoidance
- 7.2 Specific Anti-Avoidance Rules (SAAR) – Beneficial Ownership
- 7.3 General Anti-Avoidance Rules (GAAR)

### 8 Recent Developments in International Tax Law

- 8.1 Driver for Recent Developments
- 8.2 Overview of OECD's Two-Pillar Solution

The OECD's Two-Pillar Solution effectively changes the tax landscape of countries, especially in the Gulf Region. The Pillar Two applies to groups having turnover above €750 million (AED 3.15 billion). The proposal requires that such corporations are taxed at a minimum effective rate of 15%, with certain safeguards provided not taxed at 15%. This course explains the basics of the Pillar Two proposal and nuances of how the minimum tax is levied, calculated and enforced.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Overview

- 1.1 Objectives of Global Minimum Tax
- 1.2 Building Blocks – CbCR to Pillar 2
- 1.3 Specific Policy Considerations

### 2 Scope

- 2.1 Key Definitions
- 2.2 Revenue Threshold
- 2.3 Groups Covered
- 2.4 Geographical Scope
- 2.5 Excluded Entities
- 2.6 Group Structure

### 3 Charging Provisions

- 3.1 Key Definitions
- 3.2 Rule Order
- 3.3 Income Inclusion Rule
- 3.4 Qualified Domestic Minimum Top-up Tax
- 3.5 Under-Taxed Payment Rule
- 3.6 Subject-to-tax-Rule
- 3.7 Implementation & Enforceability
- 3.8 Effective Tax Rate

### 4 Adjusted Covered Taxes

- 4.1 Covered Taxes
- 4.2 Additions and Deductions to Covered Taxes
- 4.3 Allocation of Covered Taxes
- 4.4 GloBE Income Return

### 5 GloBE Income

- 5.1 Calculation of GloBE Income
- 5.2 Further adjustments
- 5.3 Qualified Refundable Tax Credits
- 5.4 Allocation of GloBE Income
- 5.5 GloBE Income Calculation - Reporting
- 5.6 Additional Current Top-up Taxes

### 6 Substance Based Income Exclusion

- 6.1 Overview
- 6.2 Transitional Relief
- 6.3 Reporting

The course offers the opportunity to discuss the most recent developments of domestic direct tax legislation in the GCC countries and to assess the impact of OECD and EU initiatives on the tax legislation and tax treaties in this region.

In addition, it discusses the GCC Economic Agreement and the Double Tax Treaty between the UAE and KSA. It looks at investment routes, ideal holding structures and impacts of joint ventures on taxation.

The training applies for all types of businesses internationally active in the GCC across all sectors.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Overview of regional corporate tax regimes

- 1.1 Types of taxes in the region
- 1.2 Sources of tax laws
- 1.3 Definition of income, capital gains and losses
- 1.4 Basic computation rules
- 1.5 Tax rates
- 1.6 Tax incentives
- 1.7 Popular forms of doing business
- 1.8 Group consolidation rules
- 1.9 Treatment of profit distributions and shareholdings
- 1.10 The impact of the GCC on taxation

### 2 Domestic laws

- 2.1 KSA
- 2.2 Bahrain
- 2.3 Qatar
- 2.4 UAE
- 2.5 Oman
- 2.6 Kuwait

### 3 Special topics

- 3.1 Specific requirements for investments
- 3.2 Financial centers in the GCC
- 3.3 Free-zones and other business features

# 21 Accounting for Zakat in KSA

This course on Zakat in Saudi Arabia guides the attendees through the principles of Zakat, how to calculate it and when to file the declaration. The training was designed for finance, tax specialists, tax managers, accountants, auditors, financial analysts, and financial controllers having to deal with Zakat in the Kingdom of Saudi Arabia.

The training applies for all types of businesses active in the KSA across all sectors and which are owned by GCC nationals.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 The Principles of Wealth and Zakat In Islam

- 1.1 Concept
- 1.2 Characteristics and goals of Zakat
- 1.3 Differences between Zakat and Tax

### 2 Types and rates of Zakat

- 2.1 Cash equivalent Zakat
- 2.2 Fruits and crops (Agricultural produces) Zakat
- 2.3 Livestock (Cattle) Zakat
- 2.4 Treasures Zakat
- 2.5 Business Zakat

### 3 The principles of business Zakat in the KSA

- 3.1 Business Zakat regulations in the KSA
- 3.2 Persons subject to Zakat
- 3.3 Activities subject to Zakat
- 3.4 Zakat base and rate

### 4 How to calculate the zakat base

- 4.1 Methods of calculating the business Zakat base (working capital vs. capital employed)
- 4.2 KSA law requirements (capital employed method)
- 4.3 General rules and conditions for Zakat base
- 4.4 Zakat base components (deductible and non-deductible items)
- 4.5 Adjustment of business profit for Zakat purpose

### 5 Accounting for business Zakat and tax implication

- 5.1 Filing the return
- 5.2 Examination, objections and appeals
- 5.3 Fines under the KSA tax system

This course provides an introduction to taxation in the Kingdom of Saudi Arabia. It covers an introduction into Zakat, Corporate Income Tax and Withholding Taxes and VAT in Saudi Arabia.

It provides the attendees with basic insights and a fundamental training in KSA taxation. Attendees will be able to understand basic concepts and definitions of KSA taxation and understand its impact.

The training is designed for finance, tax specialists, tax managers, accountants, auditors, financial analysts, and financial controllers having to deal with Zakat in the Kingdom of Saudi Arabia.

The training applies for all types of businesses active in the KSA across all sectors.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Introduction

### 2 Zakat

- 2.1 The Principles of wealth and zakat In Islam
- 2.2 Types and rates of zakat
- 2.3 The principles of business zakat in the KSA

### 3 Corporate income tax and withholding taxes

- 2.1 Persons covered
- 2.2 Territorial scope of tax
- 2.3 Material scope of tax
- 2.4 Tax base and tax rates
- 2.5 Transfer pricing rules in KSA
- 2.6 Withholding taxes

### 4 VAT

- 4.1 Taxable person
- 4.2 Scope of VAT
- 4.3 Place of supply
- 4.4 Date of supply
- 4.5 Taxable base
- 4.6 VAT rates (including zero-rates and exemptions)
- 4.7 VAT liability

# Transfer Pricing rules in the GCC

Transfer Pricing is one of the most critical tax issues faced in international business. It has drawn the attention of tax authorities and taxpayers worldwide.

The existing OECD Transfer Pricing Guidelines (TPG) are being updated frequently, and the GCC countries are issuing new laws and guidelines to align with international requirements.

This course will examine the latest policy developments and tax treatment of complex Transfer Pricing transactions enabling students and professionals to expand their skills and gain knowledge in an area of considerable commercial interest.

It will also take into account the latest BEPS developments.

The training applies for all types of businesses internationally active with dealings in the GCC across all sectors.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Introduction

- 1.1 Origins of transfer pricing
- 1.2 OECD and UN approach
- 1.3 How it will come into play
- 1.4 TP rules in local legislation in GCC/status of implementation

### 2 TP Methods

- 2.1 Transactional methods
- 2.2 Profit methods
- 2.3 Other methods

### 3 Compliance

- 3.1 Reporting
- 3.2 APAs

### 4 Other legislative evolutions

- 4.1 Preventing treaty abuse: MLI
- 4.2 Exchange of information in future in the GCC

### 5 Transfer pricing and withholding taxes

### 6 Transfer pricing and customs legislation

# Transfer Pricing in KSA

Transfer Pricing is one of the most critical tax issues faced in international business. It has drawn the attention of tax authorities and taxpayers worldwide.

The existing OECD Transfer Pricing Guidelines (TPG) are being updated frequently, and the GCC countries are issuing new laws and guidelines to align with international requirements.

This course will focus on KSA and how it has implemented transfer pricing regulations, and the impact it has had on KSA. KSA was the first GCC Member State to implement extensive transfer pricing legislation. It is applicable as of 2018.

The training applies for all types of businesses internationally active with dealings in KSA across all sectors.



## Length of workshop and mode of study

This is an in-person half-day workshop lasting approximately 3 1/2 hours.



## Course content

### 1 Introduction

- 1.1 Origins of transfer pricing
- 1.2 OECD and UN approach
- 1.3 How it will come into play
- 1.4 TP rules in the GCC/status of implementation

### 2 TP Methods

- 2.1 Transactional methods
- 2.2 Profit methods
- 2.3 Other methods

### 3 Compliance

- 3.1 CTDF
- 3.2 Country by Country report
- 3.3 Master file and local file
- 3.4 Corporate Income Tax return and Withholding Tax return

### 4 Other legislative evolutions

- 4.1 Preventing treaty abuse: MLI
- 4.2 Exchange of information in KSA

### 5 Transfer pricing and withholding taxes

### 6 Transfer pricing and customs legislation



# LONG TERM VAT COURSES

The course in GCC VAT is designed for lawyers, economists, accountants and other finance professionals or those aspiring to embark on a career in taxation.

The course focuses on general VAT principles and the OECD VAT/GST guidelines. It also compares the EU VAT system to the GCC system, and broadly focuses on systems around the world. A special focus will be put on international trade, as well as selected topics.

The course will explore basic concepts such as taxable persons, taxable supplies, place of supply, taxable base, rates and VAT liability. The last day will end with a capstone assessment and an open Q&A session.

The training applies for all types of businesses internationally active with dealings in the GCC across all sectors.



## Length of workshop and mode of study

---

This is an in-person 3 days workshop. Each class lasts approximately 4 hours.



## Course content

---

### 1 VAT background

This course highlights the relevant aspects of the history of VAT and provides an introduction of the OECD VAT/GST guidelines that underpin the whole course content.

It also addresses the evolution of VAT in more mature jurisdictions and serves as guidance on the future of VAT in the GCC region, providing an overview of the introduction of VAT in the GCC region.

- 1.1 Origins of VAT
- 1.2 OECD VAT/GST guidelines
- 1.3 VAT in the EU
- 1.4 Implementation of VAT in the GCC
  - 1.4.1 VAT in the UAE
  - 1.4.2 VAT in the KSA
  - 1.4.3 VAT in Bahrain



## Course content

---

### 2 VAT principles

In this course, the basic principles of VAT will be discussed. It provides insights into how VAT works and how to analyze the VAT treatment of a specific transaction. The course starts by taking a closer look at the concepts of "taxable person" and "tax groups".

Secondly, it will examine which transactions qualify as so-called "taxable transactions" from a VAT perspective followed by the "place of supply" rules which determine which country is competent to potentially levy VAT.

The second part of the course focuses on the "time of supply" rules which indicate the tax period in which a transaction is deemed to take place as well as the VAT return in which a transaction should be reported.

"Taxable base", "VAT rates" and "VAT liability" will close the day with the definitions of the bases upon which VAT should be calculated, the difference between standard-rated and zero-rated transactions and indicating who is responsible for paying VAT to the tax authorities.

- 2.1 Taxable persons
- 2.2 Taxable supplies
- 2.3 Place of supply
- 2.4 Time of supply
- 2.5 Taxable base
- 2.6 VAT rates
- 2.7 VAT liabilities

### 3 VAT obligations

This part explains the obligations of the taxpayer towards the tax authorities. The registration process, group registration and consequences of non-registration will be examined, as well as the invoicing requirements and how crucial they are for VAT accounting and recording purposes.

Furthermore, the VAT accounting and record keeping requirements will be pointed out, and likewise for the process to file the return and how to make payment of the VAT due. The course ends explaining the special cases provided for the refunds provided by the agreement and how to claim it.

- 3.1 Registration
- 3.2 Invoicing & Accounting
- 3.3 Tax return
- 3.4 Tax refunds

The introduction of VAT in the UAE has made it imperative for all finance, accountant, legal and tax professionals to not understand only the main features of the VAT system but also gain a deep understanding of the currently available legislation and guidance published by the UAE's Federal Tax Authority.

This training series includes 4 modules. Participants will gain a strategic and in depth overview of the framework and underlying principles of VAT in the United Arab Emirates.

This compilation of 4 courses is designed to prepare tax professionals technically to deal with the financial and reporting impacts of VAT in the UAE.

The training applies for all types of businesses internationally active with dealings in the UAE across all sectors.



## Length of workshop and mode of study

This is an in-person workshop taking place over 4 days. Each class lasts approximately 2 hours.



## Course content

### 1 UAE VAT Scope (Module no. 1)

This module will discuss the origin and scope of UAE VAT. It will provide insights on how VAT works and detail the persons and transactions subject to VAT in the UAE.

- 1.1 Origins of VAT
- 1.2 Implementation of VAT in the Gulf Cooperation Council
- 1.3 VAT laws in the UAE
- 1.4 Taxable persons and tax groups
- 1.5 Taxable transactions

### 2 UAE VAT Principles (Module no. 2)

In this module, we will allow the discussion on the VAT treatment of different transactions, detailing the main principles and rules applying to this tax in the UAE.

- 2.1 Taxable base
- 2.2 VAT rates
- 2.3 Place of supply
- 2.4 Time of supply
- 2.5 VAT liability

### 3 UAE VAT Compliance (Module no. 3)

This module will go through the taxpayers' obligations such as record keeping and invoice requirements and discuss the process to file the return, correct it and how to make payment of the VAT due or request for a refund.

- 3.1 Record keeping
- 3.2 VAT obligations and invoicing requirements
- 3.3 VAT Return
- 3.4 Payment of VAT and refund request
- 3.5 Corrections and voluntary disclosure

### 4 UAE VAT and Tax Procedure (Module no. 4)

The breakdown of the audit and appeal process will be the core of this module culminating in a case study summarizing the elements learnt during the training.

- 4.1 Audit and objections
- 4.2 Administrative penalties
- 4.3 Reconsideration and Tax Dispute Resolution Committee
- 4.4 Litigation Process

# WHO ARE WE?

Aurifer is a boutique tax firm established in Dubai. The company was born from the need of the market for a more personal assistance with the VAT implementation in the GCC region.

## AURIFER

### AURIFER AIMS TO BE A PERSONAL PRAGMATIC PARTNER OF ITS CLIENT.

The company combines the experience of a large tax firm with the attention that only a boutique firm can provide.

Aurifer exists to guide businesses and governments through assessing the impact of the upcoming CIT legislation as well as the existing VAT, Excise and Customs and other legislations and provides strategic tax advice to address any issues and seize possible opportunities.

As GCC tax specialists having been involved in the tax policy of two GCC governments and with a far-reaching knowledge of VAT in other jurisdictions, Aurifer's advisers are in a unique position to assist government entities, gulf family holdings, law and service firms and global top-tier businesses based in the GCC with their tax matters.

Aurifer's experts guide businesses and individuals through questions around tax residency, analyzing how double income tax treaties apply to their structure and transfer pricing requirements.

Aurifer's team has also an extensive training experience in multiple jurisdictions, having provided training both to professionals and on an academic level.



AURIFER

aurifer.tax

Brussels · Dubai · Riyadh