

WU Vienna University of Economics and Business

The Institute for Austrian and International Tax Law is among the largest academic institutions in the world doing research on and teaching about tax law. The staff of the Institute consists of more than 35 full time employees, most of them researchers and about 100 visiting professors from all parts of the globe. The Institute is part of WU (Vienna University of Economics and Business), with 24,000 students the largest business school in Europe. The main fields of interest of the Institute are corporate tax law, international tax law and European tax law. Most of the researchers are dealing with issues in these areas, both in teaching and research. Practitioners shall benefit from the unique knowledge and practical experience of the Institute in the area of tax treaty law.

Dr. Pasquale Pistone, Professor of European and International Tax Law-
WU Vienna University of Economics and Business

Dr. Mario Tenore, Ph.D in Tax Law by the II University of Naples (Italy)

Prof. Dr. Pasquale Pistone: Professor Pistone, is EURYI-ESF Professor of European and International Tax Law at the WU Vienna University of Economics and Business. Associate Professor of Tax Law at the University of Salerno. Member of the Junior Senate of the Austrian Academy of Sciences. Director of the Postgraduate Course in European and International Tax Law at the University of Salerno (Italy). Member of the Board of Editors of Intertax. Member of the ECJ Task Force of the Confédération Fiscale Européenne and of the Board of Directors of the Italian IFA Branch. Has extensively lectured around the world and been visiting professor at the Universities of Tilburg, Paris 1, São Paulo (USP) and Florida. Editor of seven books, author of two monographs and about 85 articles on international and European tax issues, written and/or translated in various languages. Fluent in seven European languages.

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Dr. Mario Tenore: Dr. Tenore is a Ph.D. in Tax Law by the II University of Naples (Italy). Member of the EURYI-ESF Research Team at the WU Vienna University of Economics and Business. Research Assistant at the University of Salerno. Coordinator of the Postgraduate Course in European and International Tax Law at the University of Salerno (Italy). Lectures at various postgraduate courses in Europe. Author of various articles on international and European tax law, written and/or translated in English, Italian and Portuguese and published in specialized tax journals. Fluent in three European languages and with basic knowledge of two more languages.

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TRAINING PROGRAMME Tax Treaty Interpretations



In co-operation with



WU Vienna University of Economics and Business



Organized by

FOUNDATION FOR INTERNATIONAL TAXATION

C/o T. P. Ostwal & Associates

104, Bharat House , 4th Floor, Mumbai Samachar Marg, Fort, Mumbai 400001 - India
Tel. 9122 4069 3939 Fax. 9122 4069 3999 Email: internationaltax.foundation@gmail.com

Date : 22nd & 23rd June, 2009

Time : 09.30 am to 17.30 pm

Venue : MAYFAIR BANQUETS, WORLI, MUMBAI, INDIA

TRAINING PROGRAMME
SUBJECT : TAX TREATY INTERPRETATIONS
 Training Venue: **MAYFAIR BANQUETS, WORLI, MUMBAI, INDIA**

About the Programme

With the integration of global economy, the mergers and acquisitions have become order of the day. International Taxation is becoming a very critical and important strategic factor in all cross border investment decisions. In order to promote global trade and commerce, many countries have entered into taxation treaties with each other to provide incentives and attract investment in their respective countries.

As part of the on-going activities, Foundation for International Taxation has organized a two day Training Programme on Tax Treaty Interpretations in cooperation with Vienna University of Economics and Business. Dr. Pasquale Pistone and Dr. Mario Tenore, Senior Faculty Members and experts on the subject will conduct the programme.

The outline of the training programme is structured in a way to combine the traditional teaching of Tax Treaty Articles (Based on the OECD, MTC, though without excluding reference to the UN MTC) focusing on specific issues with practice. Sessions will cover how European law obliges EU Member States - in relations with non-EU countries - to interpret and apply tax treaties. The sessions will be interactive. Understanding and interpretation of tax treaties and its business implications will be the main focus of the programme.

Profile of Participants

Senior Members of the Management team involved with Pan Global Strategic Decision making about operations, investments and business expansion will find the training programme useful.

Participants are expected to have basic understanding about business finance, planning and taxation.

CEOs, CFOs, Financial & Tax Advisors, Chartered Accountants and officials from Department of Revenue will find the course very valuable and useful.

Monday, June 22, 2009

09.30 - 10.00	Registration & Coffee
10.00 - 10.15	Welcome Kiran Umrootkar, Trustee, Foundation for International Taxation
10.15 - 11.30	Dr. Pasquale Pistone Scope and Interpretation of tax Treaties
11.30 - 13.00	Dr. Pasquale Pistone FOCUS on Abuse : Tax treaties and domestic law
13.00 - 14.00	Lunch
14.00 - 15.30	Dr. Mario Tenore PE and Business Income
15.30 - 16.00	Tea / Coffee
16.00 - 17.30	Dr. Mario Tenore Passive Income

Tuesday, June 23, 2009

09.30 - 11.00	Dr. Pasquale Pistone Articles 15-20
11.00 - 11.30	Tea / Coffee
11.30 - 13.00	Dr. Mario Tenore Other distributive rules
13.00 - 14.00	Lunch
14.00 - 15.30	Dr. Pasquale Pistone Procedural rules
15.30 - 16.00	Tea / Coffee
16.00 - 17.30	FOCUS on Tax Treaties and European law

Hurry !
Limited Seats

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Tax Treaty Interpretations

DELEGATE REG. NO. _____

DELEGATE REGISTRATION FORM

DELEGATE DATA (In Block Letters) - A separate form is required from each delegate to register for the conference.

Name : _____
 Company : _____
 _____ Designation: _____
 Address : _____
 _____ Pin code No. _____
 Tel.(Off): _____ Fax: _____
 Mobile : _____ E-mail (mandatory) : _____

Hotel Reservation : The conference organizers have made the following arrangements for your stay during the conference:

- (a) ITC, The Grand Central
 Email : reservations.itcgrandcentral@itcwelcomgroup.in. If you require booking form for conference room rate, tick here Yes:_____ No:_____
- (b) Other hotels and post-conference excursions : Ms. Farzana Tewari, Leading Edge Travel Mgmt. Pvt. Ltd.
 Email : farzana@leadingedge-india.com
 Please contact directly. You may also download the brochure and Registration Form from our website www.fitindia.org

Indian Visa : Delegates from countries other than India usually need a valid Indian visa. Please check with the local Indian embassy. If you require an invitation letter from us for visa purposes, tick here Yes:_____ No:_____

Please send this form by post, e-mail or fax with delegate fee to
Foundation for International Taxation
 Attn: Uma Sathnur - 109, Marine Chambers, 43, New Marine Lines,
 Churchgate, Mumbai - 400 020, India; Tel : 91-22 66101964 / 65
 Telefax : 91-22 66101964 / 65 Email: internationaltax.foundation@gmail.com;

Regular Rate (per delegate)	Rs. 25,000/- + Service Tax 10.30%
Note:USD rates apply to non-Indian residents	US\$500 inclusive of Indian Service Tax
<p>For foreign delegates, the amount is inclusive of Indian service tax of 10.30%. The Indian Rupee amount is exclusive of service tax, and an additional creditable service tax amount @ 10.30% is payable. (Our Service Tax Registration No. ST / Mumbai / COV / Dn / II / 36 / 2006). There is no TDS requirement. Please tick here if you require an official Invoice/Receipt from F.I.T. to be mailed or faxed to you.</p> <p style="text-align: right;">Yes:_____ No:_____</p>	
REFUND POLICY : The fees are non-refundable.	