



Marbella, March 2009

## INVITATION

*Course  
Friday 3 July 2009*

Dear TTN-member,

Based on the success of last years' Course held in Copenhagen on International Holding Structures, the Executive Committee has arranged again for a one day Course on the Introduction of Tax Treaties.

*The Course is an introductory level Course which is designed to provide participants with a framework for understanding the main issues involved in the application of income tax treaties. In particular, the Course will cover the application of tax treaties (including limitation of benefits and other anti-avoidance rules), the concept of permanent establishments, passive income (i.e. dividends, interest and royalties) and double tax relief methods.*

The Course will be held in Amsterdam on Friday 3 July 2009 and will be presented by the International Tax Academy of the IBFD, the International Bureau of Fiscal Documentation ([www.ibfd.com](http://www.ibfd.com)). The Course is intended for younger tax practitioners in our member firms who are interested in the application of tax treaties. The course instructors are Mr. Shee Boon Law, a Principle Research Associate in the IBFD's International Tax Academy and Mr. Harry Tonino, a Senior Research Associate in the IBFD's International Tax Academy.



The advantage of an in house Course for TTN-members is that by organizing the Course we are able to tailor make the Course and reduce costs per participant considerably. Moreover the Course will be presented in one day.

*This Course has been organised especially by the Executive Committee for members' benefit. Please give it your support by sending one (or more) of your young colleagues.*

### **Venue**

The Course will be held at the IBFD, situated at:

H.J.E. Wenckebachweg 210  
1096 AS Amsterdam

Telephone : + 31 20 554 0100  
Fax : + 31 20 622 8658



Bastion Deluxe Hotel Amsterdam Amstel is in walking distance of the IBFD. The hotel is located at the Verlengde Van Marwijk Kooystraat 30, 1096 BX Amsterdam.

The hotel offers a 24 hour front office, comfortable rooms and an extensive choice of dishes from the a la carte menu in the atmospheric restaurant. For relaxation and a nice ending of the day guests are always welcome in the cosy hotel bar or smoking lounge. This lounge contains an LCD television, air-conditioning and relaxing lounge chairs. The hotel also has free wireless internet in the entire hotel.

The cost for a Deluxe Room single or double use is EURO 111,50 plus EURO 1,50 city tax per night. The breakfast costs EURO 13,50. If you would like to stay longer in the hotel, the same rate will apply.

### ***Routing***

If you arrive in The Netherlands via Schiphol Airport, you can conveniently board the train for Amsterdam Duivendrecht. From there you can take metro 50 or 51 and get off the train at station Overamstel. From the station Overamstel it is just a short walk to the hotel. The journey from Schiphol Airport to the hotel takes 20 minutes. There is also a special shuttle service from IBFD from Station Duivendrecht to their offices every 10 minutes.

In addition to the regular public services from Schiphol Airport to the hotel, you can of course take a taxi as well. The price may vary depending on the route taken by the taxi company, but in average the cost to the hotel will amount to EURO 42. Taxi fares include VAT but no tip. You can also book until a day before arrival a taxi at the website [www.schiphol.nl](http://www.schiphol.nl) (section Transport).

### ***Programme***

#### Thursday 2 July 2009

18.30 – 19.30      Cocktails sponsored by TTN (location to be advised)  
19.30 – 22.00      Dinner (location to be advised)

#### Friday 3 July 2009

08.45 – 09.00      Registration at the IBFD  
09.00 – 10.30      Introduction to Tax Treaties  
10.30 – 10.50      Coffee and tea break  
10.50 – 12.45      Permanent Establishment  
12.45 – 14.00      Lunch  
14.00 – 15.40      Passive Income  
15.40 – 16.00      Coffee and tea break  
16.00 – 17.00      Double Tax Reliefs  
No dinner arrangements made.



***Attendance fee / registration / cancellation / others***

The Course Fee is Euro 700 including drinks, lunch and materials during the Course and the cocktail followed by a dinner on Thursday evening. If you would like to join, you are kindly requested to fill out the attached registration form and send it back to TTN's secretariat [before 1 June 2009](#). Please also transfer the Course Fee before 1 June next to TTN's bank account. You will find the bank details on the registration form.

In order to safeguard the interactive nature of the Course the IBFD agrees to a maximum of 20 participants, so register quickly (and why not today?).

Cancellations must be received in writing at least 30 days before the date of the Course. Cancellations made within 30 days will be subject to 50% of the Course Fee, except that regrettably cancellations made within 7 days of the date of the Course will not give rise to a refund. You may always send another delegate in your place.

If you have to change your hotel reservation, please contact the secretariat and not the hotel. Notification of cancellation must be sent in writing to TTN's secretariat. Cancellation costs may be charged by the hotel in the event of a late cancellation.

If you have any questions, please do not hesitate to contact Barbara Ingenbleek at TTN's secretariat.

We look forward to meeting your colleague in Amsterdam.

Yours sincerely,  
for and on behalf of the Executive Committee,

(via e-mail)

*Barbara Ingenbleek*

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Enclosures: - Registration form  
- Programme IBFD "Introduction to Tax Treaties"

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