

INTERNATIONAL
TAX CENTER
ITC
LEIDEN

**COURSE AND EXAMINATION
REGULATIONS**

**Academic Year
2020-2021**

Valid from 1 September 2020

SECTION A: Application and definitions

These Course and Examination Regulations apply to the advanced master programs of ITC:

- Advanced master of International Tax Law program
- Advanced master of Transfer pricing for multi-national enterprises program

Article 1 – Definitions

- 1.1. Program: either the master program International Tax Law, or the master program Transfer pricing for multi-national enterprises.
- 1.2. Program director: the person in charge of the program and responsible for its management.
- 1.3. Governance Board: the Board responsible for the governance and management of ITC.
- 1.4. Degree: the Master of Laws (LL.M) degree awarded upon successful completion of the program.
- 1.5. Course: any course taught and assessed as part of the program.
- 1.6. Core course: any course designated as such
- 1.7. Academic year: term of twelve months between the start and the conclusion of the program, during which the student attends classes, takes exams and writes his or her thesis.
- 1.8. EC or European credit: credit, equivalent to 28 hours of study. The course load of every course is measured in number of EC. The full program amounts to 60 EC.
- 1.9. Exam: the assessment, either in the form of a single test or in that of consecutive tests, at the end of each course of the knowledge, understanding and skills acquired by the student during that course.
- 1.10. Examination Board: the board of examiners that supervises all examinations and assessments of the program and is responsible for drawing up and applying the rules and regulations governing admission to the exams, examination procedure and grading.
- 1.11. Examiner: any teacher on the program who has been authorized by the Examination Board to conduct assessments.
- 1.12. Grade: the mark, in the range of 1-10, awarded by the examiner to the performance of a student during an assessment.
- 1.13. Term: the period before (first term) and after (second term) Christmas holidays.

SECTION B: Program and admission

Article 2 – Requirements for admission

- 2.1. In addition to the formal requirements for admission to the programs of ITC, applicants:
 - must have a master degree in law, offering access to legal practice in the country where it was obtained, or have a master degree in a related field of study, from a recognised university or law school;
 - must have two letters of recommendation from current or previous professors and/or employers;
 - must show a keen interest in matters of law in the program of interest and the (legal) implications thereof, illustrated by a letter of motivation;
 - must produce documented evidence of relevant (work) experience (if applicable);
 - must have proficiency in English, validated through a TOEFL test (600 paper-based or 100 Internet-based) or IELTS test (7.0) with the correct band scores of 20/6.0 or higher or Cambridge CPE/CAE 185, occasionally complemented by a telephone interview. This requirement does not apply to students

who have completed their education in Canada, USA, UK, Ireland, New Zealand or Australia, or who hold an International Baccalaureate.

2.2. Meeting the admission requirements does not necessarily guarantee an admission offer. Students are selected on the basis of overall merit.

Article 3 – Objective of the programs

The objective, the learning outcomes and the attainment level of the programs are described in annex X to these Course and Examination Regulations.

Article 4 – Courses and classes

4.1. The master programs of ITC are accredited by the NVAO¹ and fully comply with the customary international standards for academic master degree programs.

4.2. Each program is composed of eight to twelve core courses. No elective courses are offered. The credits for each course are measured in units of 28 hours (European credits or EC). Since courses may be less or more comprehensive, the total of EC granted may vary between courses. The total of credits for each program equals 60 EC.

4.3. Classes in each program start in the last week of August each year.

4.4. All courses are taught and assessed sequentially and are in English.

4.5. Class attendance is required throughout the program, and the re-scheduling of any class, workshop or tutorial cannot be accepted as an excuse for being absent, unless stated otherwise. Students are required to attend at least 80% of the class hours in each course of the program. If the number of lectures of a given course is equal or less than four, the student may not be absent for more than one class. Attendance cannot be retroactively recorded or changed.

4.6. Students must successfully conclude their studies for the program before the end of the academic year; this includes both all of the courses and the thesis.

4.7. For every course of the program, a full course description will be included in the program guide which will be available before the start of classes. This course description includes:

- an outline of the subject matter taught and of the way it will be assessed;
- the requirements and guidelines concerning the writing of the thesis;
- the course load of each course, measured in EC-credits;
- a timetable of classes and assessments.

Article 5 – Study support and guidance

5.1. The program coordinator registers the study results of each individual student and monitors his or her study progress.

5.2. Upon request, the program coordinator will provide the student with an overview of his or her results. Alternatively, students may check their results with the student services of ITC at any time.

5.3. Each student will be invited to discuss his or her progress in studies in a private meeting with the program director, both in the first and in the second term of classes.

5.4. If, according to the program coordinator, a student risks a substantial delay in the study progression, the program director will discuss with the student an individual study scheme in order to catch up on the delay incurred.

¹ NVAO: Nederlands-Vlaamse Accreditatie Organisatie (Dutch-Flemish Accreditation Agency).

Article 6 – Impairment and studies

6.1. Students with a reading disability, a physical impairment or a chronic medical condition will be offered the opportunity to study and to take exams in accordance with the limitations resulting from their impairments, provided that they can be reasonably expected to complete their studies before the end of the academic year.

6.2. Special arrangements for students with a disability shall not exceed the limits of what the condition of the student requires and shall be restricted to what in the circumstances is reasonably feasible.

6.3. Students should notify ITC at the time of their application for admission of any impairment that may hamper or delay their studies at ITC. Upon receipt of the application, ITC will decide if the special arrangements the impairment requires are within the possibilities of ITC's, and then advise the student on whether, and how, to proceed with his or her application.

SECTION C: Grading and Assessment

Article 7 – Examinations

7.1. Exams will be held at the end of each course. In case a student fails an exam for a particular course, he or she is entitled to retake that exam at a fixed date. Students will be notified of the date of the exam at the start of each course.

7.2. The form in which course content is examined is, within the confines of the Rules and Regulations of the Examination Board, at the discretion of the teacher/examiner, and must be properly announced at the start of classes of each course.

7.3. Exams will typically be taken in writing. Incidentally, oral examining is at the discretion of the teacher/examiner. Oral exams shall be supervised by two examiners.

7.4. If a course contains a practical assignment, students may only sit the examination if they have successfully completed the practical assignment, unless otherwise stated.

7.5. No student shall be excused from taking any scheduled form of assessment, except for valid reasons for which prior explicit permission is obtained from the Examination Board, or in clear cases of hardship.

7.6. A student is considered to have failed the exam if the weighted average of the grades obtained for all required assessments of the course is less than 6.0.

7.7. In the case of open book exams, only those materials as indicated in advance by the lecturer are admitted into the exam. Should the materials contain any notes apart from duly authorized brief marginal notes, the materials may not be used for the exam. It is the responsibility of the student to bring a clean copy of the materials to the exam.

Article 8 – Grading

8.1. Courses are graded on a scale from 1 to 10, half-grades being allowed:

9.5 – 10 = outstanding

8.5 – 9.0 = excellent

7.5 – 8.0 = very good

6.5 – 7.0 = good

6.0 = pass

5.5 or less = fail

8.2. An exam has been passed if the result is 6,0 or higher.

8.3. An exam review will be held within a period of two weeks after the grades have been returned. During the review, any questions that a student may have regarding the exam ought to be brought up. After the review, no other opportunity for discussion of the exam is available, with the exception of the appeal referred to in Article 16.

8.4. After the results of an exam have been returned and before the exam is reviewed, the student is entitled to inspect his or her handed-in examination paper and its assessment by the examiner. Date and location for the inspection are to be determined and published by the course coordinator.

8.5. The student's average grade for the program is determined by the weighted average of the rounded off grades obtained for each of the courses, including the thesis, the weights being based on the number of EC credits of each course. The average grade is not rounded off.

Article 9 – Returning of grades

Grades shall be returned within two weeks after the examination date or the date of submission of any written work.

Article 10 – Retake of exams

10.1. A student who fails an exam is allowed a retake. It remains at the discretion of the lecturer/examiner to decide the date and form of the retake. The grade obtained in the exam retake will replace the grade of the failed exam. The date of the exam retake will be announced after any exam review session.

10.2. A student who for the reasons referred to in Article 7(5) missed the opportunity to take an exam, may apply to the Examination Board for a new opportunity. If the board grants the student a new opportunity, it will be at the discretion of examiner to decide the date and form of the exam.

10.3. The grade to be registered for the retake exam ('final grade') is reduced if the initial grade for the retake exam is above 6.0. To the extent the initial grade exceeds 6.0 it will be taken into account for the final grade for one-third. If a student joins a retake exam not because s/he failed the first exam but for a documented medical reason, the excess over 6.0 is taken into account for two-thirds. Any bonus points earned from exams or course submissions will not be counted when calculating retake exam grades.

Article 11 – Validity of grades

The period of validity for grades granted equals five years, effective from 1 September of the academic year following the academic year in which the grades have been granted.

Article 12 – Thesis

12.1. The thesis must address and analyse a subject falling within the scope of the program for which the student is enrolled. The research question and the design of the thesis must be approved by the program director before the student starts his or her research.

12.2. The directives and guidelines applicable to the researching and writing of the thesis for any of the programs of ITC will be adopted and published by the Examination Board.

12.3. In the event of failure of an exam for a core course, students may not start their research for the thesis until the exam has been passed unless, upon request, permission has been granted by the Examination Board. The request must be addressed in writing to the Examination Board by the student.

Article 13 – Conferral of master degree

- 13.1. On the student who has successfully completed the program, the Examination Board shall confer the degree of Master of Laws (LL.M).
- 13.2. All courses that form part of the program curriculum, including the thesis, must be passed in order to qualify for the degree, with a course load total of at least 60 EC.
- 13.3. The degree shall only be conferred on students who enrolled for the program as a degree seeking student.
- 13.4. The degree may be conferred with the distinctions cum laude (with honours) or summa cum laude.
- 13.5. The degree will be conferred with the distinction cum laude if the following conditions are met:
- all courses and the thesis have been completed with a minimum grade of 6.0;
 - the weighted average for all courses (final rounded grades only) and the thesis (final rounded grade only) of the program is 8.0 or higher;
 - the grade for the master's thesis is 8.0 or higher;
 - all courses and the thesis have been completed in the academic year for which the student has been enrolled;
 - the student has passed all of their exams without retakes;
 - the student has not been subjected to any disciplinary measure of the Examination Board in response to acts of fraud or plagiarism, nor has been formally reprimanded by the governance board.
- 13.6. The degree will be conferred with the distinction summa cum laude if the following requirements are met:
- All components were completed with a minimum grade of 6.0.
 - The weighted average for all courses (final rounded grades only) and thesis (final rounded grade only) (of the program) is 9.0 or higher;
 - The master's thesis is graded 9.0 or higher;
 - all courses and the thesis have been completed in the academic year for which the student has been enrolled;
 - the student has passed all of their exams without retakes;
 - the student has not been subjected to any disciplinary measure of the Examination Board in response to acts of fraud or plagiarism, nor has been formally reprimanded by the governance board.
- 13.7. Upon conferral of the degree, the student will be awarded a diploma by the Examination Board. The diploma is the official testimonial of the degree conferred. An academic transcript will be added as a diploma supplement. If the degree has been conferred cum laude or summa cum laude, mention of this distinction is made on the diploma.
- 13.8. Diplomas will be issued at the graduation ceremony or after the ceremony as soon as the student has successfully completed the program.

SECTION D: Fraud and plagiarism

Article 14 – Fraud and plagiarism

- 14.1. Fraud and plagiarism denote any act by a student that has the effect of distorting his or her performance in such a way that it prevents a true and correct judgment about his or her knowledge, understanding and skills.
- 14.2. Fraud includes, inter alia:
- cheating or colluding during assessments;
 - submitting any work already submitted for assessment as part of another course within the program or at any other university, college or school;
 - submitting under one's own name any work composed and written by another author.

14.3. Plagiarism denotes the reproduction, either willingly or inadvertently, in a thesis or other written coursework of passages, paragraphs and data from either written work of other authors or former written work of one's own without proper acknowledgement.

14.4. In case a student commits fraud or plagiarism, the Examination Board may apply a sanction it considers proportionate to the gravity of the infraction. However, sanctions are limited to the sanctions exhaustively enumerated in the Rules and Regulations of the Examination Board.

14.5. Before making a decision on the application of a sanction, the Examination Board enquires into the alleged infraction, and hears the student's version of the incident. The board notifies the student of its decision in a written statement.

SECTION E: Appeal and revision

Article 15 – Appeals to the Examination Board

15.1. An appeal against an examination assessment or any other decision by an examiner concerning the conduct of the student during examination must be lodged by the student with the Examination Board within two weeks after the decision date. The appeal is in writing, and must state:

- name of the appellant;
- the date and the content of the decision appealed;
- the name of the examiner who made the decision;
- the grounds of appeal.

15.2. The Examination Board, prior to the appeal hearing, will investigate the appeal matter in such manner as it deems appropriate.

15.3. An appeal hearing will be held by the Examination Board within three weeks after the date the appeal has been lodged. The student shall appear at the hearing in person, and may have an adviser present. At the hearing, the student may present any evidence he considers proper to advance his case.

15.4. If the student, without due notice, does not appear at the hearing, the Examination Board may decide on the case without hearing the student. However, any evidence the student may have presented up till the date of the hearing should be considered by the Examination Board in its appraisal of the appeal.

15.5. The Examination Board shall hand down its written judgment within two weeks after the date of the hearing. Its judgment is final, and cannot be appealed.

15.6. Appeals are to be addressed to:
Secretary of the Examination Board of ITC,
[address]

Article 16 – Request for revision

16.1. The student whom has been served a sanction of the Examination Board because of committed fraud of plagiarism may make a request for revision of that decision to the Examination Board within ten days after the date the decision was made.

16.2. The request for revision must state the reasons for the request.

16.3. The Examination Board may summon the student to explain his request or adduce additional proof. It decides on the merits of the request. Its decision is final, and cannot be appealed.

SECTION F: Misconduct

Article 17 – Misconduct

17.1. Misconduct is a serious infraction by a student of the rules and of the conventions of decent behaviour and civility that govern everyday life on and around the premises of ITC. Typically, misconduct is involved in cases of:

- intimidating, harassing or threatening, in any form, fellow students, administrative or academic staff;
- acting disorderly, whether or not under the influence of alcohol and/or narcotics, in or around ITC.

17.2. In case a student is caught in an act of misconduct, the Governance Board may apply one of the sanctions below:

- give a formal warning to the student;
- discontinue the registration of the student.

17.3. Before deciding on the application of a sanction, the Governance Board enquires into the alleged infraction, and hears the student's version of the incident. The program director notifies the student of its decision in a written statement.

Article 18 – Discontinuance of registration

18.1. In grave cases of misconduct as referred to in Article 17, the Governance Board may discontinue a student's registration. Discontinuance is effective as of the date the Governance Board appoints in its decision, of which the student shall be notified in writing. Before the Governance Board decides, it will hear the student and give him or her the opportunity to discuss the case brought against him or her.

18.2. As from the date of discontinuance of his or her registration, the student is not allowed anymore to attend classes, take exams, receive any course materials or take the degree. He or she will no longer have access to the services and the premises of ITC.

18.3. A student whose registration has been discontinued and who paid the tuition fees due for the relevant period of registration may request a transcript listing the subjects and academic credits obtained for all courses he/she has completed prior to the discontinuance.

SECTION G: Final provisions

Article 19 – Modifications and amendment

These Course and Examination regulations will be reviewed and amended by the Governance Board on an annual basis and according to a prescribed procedure. Barring this regular review, incidental amendments can only be made in the event of strict necessity and only in circumstances where the interests of the students are not impinged. These amendments cannot be to the prejudice of students or have any effect on whatever decision the Examination Board has taken in respect of a student.

Article 20 – Publication

The governing board of the ITC ensures proper publication of both the Course and Examination regulations and the Rules and Regulations of the Examination Board, including the incidental amendments to both of these regulations.

Article 21 – Term of operation

The present rules are effective as from 1 September 2020.

ANNEX A

Objective, learning outcomes and end qualifications of the Programs

1. International Tax Law Program

The Master of Laws program in Advanced Studies in International Tax Law (hereinafter: the program) was offered for the first time in 1998, i.e. the academic year 1998–1999. The program was originally accredited under the name of Master of Laws in International Taxation. The program has undergone regular changes in the range and content of (some of) its courses and the currently offered program represents a further development of the original set-up.

In general, tax law is widely considered a specialist field which is difficult to enter for the uninitiated. Within tax law, international tax law and particularly tax treaty law is looked at in a similar way. Without specialist knowledge this area is widely regarded as risky to enter and difficult to find one's way. Through a very thorough training in the theory of tax treaties and a supplementation of this theory with a considerable number of problems and case studies, by the end of their year all students have acquired an unusually high degree of insight in this minefield area.

The program further provides students with profound knowledge and specialist insight into the vast range of issues they may encounter in international tax practice. They are able to critically read and analyse the most important sources of international tax law, including the OECD Model Convention and Commentaries; OECD follow-up reports on special topics such as income attribution to permanent establishments; the OECD transfer pricing guidelines; the EU primary and secondary legislation (including the VAT Directive, which is the subject of a separate elective course), and the complex and comprehensive case law of the EU Court of Justice in tax matters.

In addition, the program familiarises students with the most important cross-border features of domestic statutory law and case law of the United States and, to a limited extent, of the Netherlands, as well as with international planning techniques in the areas of both company taxation and estate taxation and planning.

Taking into account the requirements expressed by the professional field, the program deliberately comprises training in the practical application of the topics mentioned, particularly through the assignments. Further, in view of the multicultural differences among the students with regard to English drafting skills, specific attention is paid to the development of these skills, through the coursework and, finally, the thesis that needs to be written.

The academic and professional profile of the program has been drawn up in dialogue with the academic and professional field. Feedback from students is obtained both during the courses (through a detailed evaluation procedure) and through brief meetings the director has periodically with the students. Alumni feedback is received through frequent correspondence with alumni who keep them abreast of professional developments and through the alumni events that are held every year at the end of August.

The overall objective of the Master of Advanced Studies in International Tax Law (program) is to provide its students with the profound knowledge and insight to work in positions within the government and in the private sector that require high-level theoretical and operational knowledge of international and EU tax law. It offers a high level of training in all aspects of international and EU tax law in a very demanding and comprehensive curriculum. Its students can be distinguished in three groups: (a) those who recently graduated from a university (post)graduate law and economics program, (b) those who have been in private (tax) law practice for some years, and (c) those who have worked in a (tax) position with a government (typically a Ministry of Finance or a Revenue Service).

Learning outcomes

1. Overarching and specialist knowledge

The graduates have profound knowledge of and specialist insight into the vast range of issues they may encounter in international tax practice. They have a critical understanding of the most important sources of international tax law, as well as of the underlying principles and policy considerations of the international tax bodies of law, generally from an international perspective or, when appropriate, in a comparative context.

2. *Research abilities*

The graduates are capable of carrying out independent research in the vast range of issues they may encounter in international tax practice by identifying the sources, collecting data, analysing their content and judging their validity and relevance. The graduates are able to solve complex and unknown issues and cases in international tax law by posing critical questions, formulating independent opinions, drawing founded conclusions, and are able to provide innovative solutions to challenges in international tax practice. Graduates are able to formulate coherent and concise problem statements and to make recommendations and suggestions for further research.

3. *Presentation of knowledge*

The graduates are capable of presenting their findings and delivering their conclusions, both in writing and orally, in an understandable, methodical and logical manner to both experts and non-experts. Graduates demonstrate excellent writing, reading and oral English language skills, using the specific language of international tax practice.

4. *Application of knowledge*

The graduate is capable of applying the acquired knowledge, research and practical skills in professions or functions that require a high level of specialisation in international tax law. In their later professional lives, the graduates demonstrate analytical, problem-solving and negotiation skills, when working both independently and in a team, notably within a multicultural environment. In view of its relatively small size and the highly specialised nature of the international tax law community, networking skills are extensively developed.

5. *Keeping up knowledge*

The graduates are capable of keeping up their knowledge and abilities in international tax law by properly using the sources and updating the research skills obtained during the program. Through self-studying, the graduates are capable of keeping themselves abreast of statutory, regulatory and case law developments which in the sphere of international tax law occur much more rapidly than in most other branches of law. The advanced master graduates have the initial research skills to enter into a PhD-program.

6. *ICT skills*

The graduates are able to use new or enhance existing advanced ICT skills for research, writing, presentation and communication – a highly valuable asset in today's international tax practice. Virtually all submissions and communications within the program are done through the Internet. In addition, as most of the material is, to a very large extent, not found in books anymore but in digitally accessible sources (including international periodicals), the graduates are capable of dealing with the most important digital sources of literature, law and case law in the international tax law field.

2. Transfer Pricing for Multi-national Enterprises Program

The Advanced Master's Program *Transfer Pricing for Multinational Enterprises* (hereafter also referred to as *TP-MNE Program*) is a small scale, English-taught program that offers advanced training in the complex and comprehensive field of transfer pricing law, economics and practice. The target audience consists of lawyers and economists working in a commercial tax environment as consultants, as tax managers of multinational enterprises, or as representatives of tax authorities or governmental bodies. The latter category includes in particular academics working at Ministries of Finance, European Institutions and the judiciary. The program is specifically tailored to academics and talented lawyers and economists seeking to improve their understanding and knowledge of the vast field of transfer pricing, for example in the context of doctoral research.

The program objectives have been geared to the aforementioned orientation. At the present time, no internationally accepted standards exist with regard to the required qualifications, aims and objectives of degree courses at postgraduate level in the domain of transfer pricing. Therefore, the program objectives have been developed based on the academic and professional judgment of the program staff, the requirements of the leading academic and professional practitioners (e.g. prospective employers), and on the assessment of other programs covering aspects of the TP program.

The learning outcomes (see below) of an academic program must meet the demands of (international) academic peers and the professional field. For purposes of the (re-)accreditation process for all academic law degrees in the Netherlands in 2009, a joint 'subject-specific reference framework' was drawn up by the

Discipline Committee for Law of the Association of Universities in the Netherlands. It concerns a joint framework of subject-specific requirements for bachelor's and master's degrees in Law. According to this framework, an academic law program needs to provide insight into the key features of the law: its role in society; key concepts; the primary legal fields and their interconnectivity; the boundaries of the law, as well as its relativity from a multidisciplinary point of view. The TP program amply meets these demands.

It does so through a carefully structured curriculum. Transfer pricing has developed at the crossroads of international tax law, business economics and accounting. Most professionals that pursue a further study in transfer pricing, however, have been trained at a graduate level in only one of these disciplines. As a result, in order to successfully participate in the transfer pricing courses developed for the AdvLLM TP-MNE program, students should first have reached the same basic levels of knowledge and understanding in the three areas mentioned: international tax law, business economics and accounting. For that reason the program's first courses focus on providing the students with a solid foundation in these areas. Building on the knowledge and insight brought by these introductory courses, the students are trained in the basics of TP in the program's main core course 'Principles of transfer pricing'. Major TP subjects from the broad spectrum of topics touched upon in this main course are dealt with in the further core courses and in a series of specialized TP courses. The thesis with which the full-year program is concluded offers the students the opportunity to select, research and address one of the many unexplored issues that make the transfer pricing field which currently is still in its stage of development, so interesting.

The program will be offered by the International Tax Center Leiden (hereafter: 'ITC' or 'ITC Leiden'). ITC Leiden was established in 1998 to provide high quality teaching and to conduct research in the field of international tax law. ITC is recognized globally as a leading institution, particularly in the field of tax treaty law.

Learning outcomes

1. Basic and overarching knowledge

The graduate has profound knowledge of, and insight into, the characteristic features of transfer pricing and global value chains in operating models of multinational enterprises.

2. Special knowledge

The graduate has profound knowledge of, and insight into, (i) transfer pricing principles and rules as per the OECD recommendations, specific countries' legislations and internationally accepted best practices, (ii) its relationship and interaction with international tax law principles, domestic tax systems and other fields of taxation such as VAT and customs duties, (iii) its overall impact on business planning, reorganizations and corporate governance, and (iv) the specific impact of transfer pricing documentation and transparency requirements. In addition, the graduate will be familiar with the practical and procedural aspects surrounding transfer pricing, including actual implementation of transfer pricing principles and compliance issues, from planning to the tax litigation phase.

3. Analytical and research skills

The graduate is capable of researching legal questions in transfer pricing by formulating coherent and concise problem statements, collecting and analyzing data, judging their validity and relevance as well as by thorough analysis and interpretation of business, accounting, and legal sources, academic literature, and complex cases relating to questions of transfer pricing. The graduate is able to understand and critically analyze complex transfer pricing cases and the global value chains structures. He/she is able to pose critical questions, formulate an independent opinion, draw founded conclusions, provide innovative solutions to challenges in the field of transfer pricing, and to make recommendations and suggestions for further research.

4. Presentation of knowledge

The graduate is capable of presenting his/her findings in a clear, readily understandable, methodical and logical manner, both orally and in writing, to both transfer pricing and legal experts and non-transfer pricing practitioners alike (e.g., Chief Financial Officers). Candidates will develop and work on their existing writing, reading and research skills as well as their oral presentation skills. The language in all aspects of the study program is English. Therefore, English as a professional and working language, using the specific vocabulary of international tax law, business, and economics, is extensively developed.

5. Application of knowledge

The graduate is capable of applying the acquired knowledge, research and practical skills in professions or functions that require application of transfer pricing principles and rules at an advanced master's level. More

specifically:

- a. the graduate possesses the legal knowledge, insight and skills enabling him/her to pursue a career at an advanced level as a transfer pricing professional within law firms, accounting firms, business consulting firms, multinational enterprises, national tax authorities, the judiciary and international non-governmental organizations dealing with transfer pricing and international tax law;
- b. the graduate possesses legal knowledge, insight and skills qualifying him/her to pursue an academic career by conducting further academic research, e.g. in a PhD program in the areas of transfer pricing and international tax law.

6. *Keeping knowledge up to date*

The graduate is capable of keeping up his or her knowledge and abilities in transfer pricing by properly using and updating the research skills and sources taught in the TP program.