



COURSE OVERVIEW FM1085 **Tax Litigation & Appeals Management**

Course Title

Tax Litigation & Appeals Management

Course Date/Venue

October 26-30, 2025/Tamra Meeting Room,
Al Bandar Rotana Creek, Dubai, UAE

Course Reference

FM1085

Course Duration/Credits

Five days/3.0 CEUs/30 PDHs



Course Description



This practical and highly-interactive course includes real-life case studies where participants will be engaged in a series of interactive small groups and class workshops.

This course is designed to provide participants with a detailed and up-to-date overview of Tax Litigation & Appeals Management. It covers the tax litigation and appeals, tax law framework, governing authorities and causes and classification of tax disputes; the legal rights and obligations of taxpayers and structure and jurisdiction of tax tribunals and courts; the tax penalties, sanctions and stages of tax dispute lifecycle; filing and documenting tax appeals and taxpayer objection process to tax authorities; the tax audit reports and controllers' review; and the role of controllers in internal review and legal support.



Further, the course will also discuss the common errors and omissions in tax appeal filings; building a strong case with evidence and argumentation; the legal counsel engagement and coordination, proper representation in tax hearings and tribunals; the negotiation and settlement options in tax disputes and tracking ongoing tax appeals and litigation timelines; managing reputational and financial risks and handling transfer pricing disputes; and the international tax appeals and treaty disputes.



During this interactive course, participants will learn the VAT/GST appeals, litigation trends and appeals involving withholding tax and cross-border payments; the tax fraud allegations and criminal litigation exposure; coordinating global counsel and advisors and implementing tax risk management frameworks; the internal audit and litigation prevention, tax governance and documentation standards; and the automation and tools for litigation management including reporting and disclosure of contingent tax liabilities.

Course Objectives

Upon the successful completion of this course, each participant will be able to: -

- Apply and gain an in-depth knowledge on tax litigation and appeals management
- Discuss tax litigation and appeals, tax law framework, governing authorities and causes and classification of tax disputes
- Identify legal rights and obligations of taxpayers, structure and jurisdiction of tax tribunals and courts
- Recognize tax penalties, sanctions and stages of tax dispute lifecycle
- File and document tax appeals and identify taxpayer objection process to tax authorities
- Perform tax audit reports and controllers' review and identify the role of controllers in internal review and legal support
- Recognize the common errors and omissions in tax appeal filings and build a strong case with evidence and argumentation
- Carryout legal counsel engagement and coordination and proper representation in tax hearings and tribunals
- Identify the negotiation and settlement options in tax disputes and track ongoing tax appeals and litigation timelines
- Manage reputational and financial risks, handle transfer pricing disputes and discuss international tax appeals and treaty disputes
- Explain VAT/GST appeals, litigation trends and appeals involving withholding tax and cross-border payments
- Identify tax fraud allegations and criminal litigation exposure, coordinate global counsel and advisors and implement tax risk management frameworks
- Apply internal audit and litigation prevention and discuss tax governance and documentation standards
- Recognize automation and tools for litigation management including reporting and disclosure of contingent tax liabilities

Exclusive Smart Training Kit - H-STK®



*Participants of this course will receive the exclusive “Haward Smart Training Kit” (H-STK®). The H-STK® consists of a comprehensive set of technical content which includes **electronic version** of the course materials conveniently saved in a **Tablet PC**.*

Who Should Attend

This course provides an overview of all significant aspects and considerations of tax litigation and appeals management for tax managers and tax advisors, finance and accounting professionals, legal and compliance officers, in-house counsel and legal advisors, revenue and tax authority personnel, auditors and internal controllers, policy makers and regulatory officials and other technical staff.

Course Certificate(s)

Internationally recognized certificates will be issued to all participants of the course who completed a minimum of 80% of the total tuition hours.

Certificate Accreditations

Haward's certificates are accredited by the following international accreditation organizations:

-  British Accreditation Council (BAC)

Haward Technology is accredited by the **British Accreditation Council** for **Independent Further and Higher Education** as an **International Centre**. Haward's certificates are internationally recognized and accredited by the British Accreditation Council (BAC). BAC is the British accrediting body responsible for setting standards within independent further and higher education sector in the UK and overseas. As a BAC-accredited international centre, Haward Technology meets all of the international higher education criteria and standards set by BAC.

-  The International Accreditors for Continuing Education and Training (IACET - USA)

Haward Technology is an Authorized Training Provider by the International Accreditors for Continuing Education and Training (IACET), 2201 Cooperative Way, Suite 600, Herndon, VA 20171, USA. In obtaining this authority, Haward Technology has demonstrated that it complies with the **ANSI/IACET 2018-1 Standard** which is widely recognized as the standard of good practice internationally. As a result of our Authorized Provider membership status, Haward Technology is authorized to offer IACET CEUs for its programs that qualify under the **ANSI/IACET 2018-1 Standard**.

Haward Technology's courses meet the professional certification and continuing education requirements for participants seeking **Continuing Education Units** (CEUs) in accordance with the rules & regulations of the International Accreditors for Continuing Education & Training (IACET). IACET is an international authority that evaluates programs according to strict, research-based criteria and guidelines. The CEU is an internationally accepted uniform unit of measurement in qualified courses of continuing education.

Haward Technology Middle East will award **3.0 CEUs** (Continuing Education Units) or **30 PDHs** (Professional Development Hours) for participants who completed the total tuition hours of this program. One CEU is equivalent to ten Professional Development Hours (PDHs) or ten contact hours of the participation in and completion of Haward Technology programs. A permanent record of a participant's involvement and awarding of CEU will be maintained by Haward Technology. Haward Technology will provide a copy of the participant's CEU and PDH Transcript of Records upon request.

Course Instructor(s)

This course will be conducted by the following instructor(s). However, we have the right to change the course instructor(s) prior to the course date and inform participants accordingly:



Mr. Osama Harairi, MBA, BA, DBA (on-going), CPA, is a **Certified Public Accountant** and an **International Expert** in **Financial Management** with **25 years** of practical experience in the areas of **Financial Analysis & Planning**, **Finance & Auditing** Management, **Financial Markets** Regulations, **Financial Accounting**, **Financial Models & Systems**, **Financial Indicators**, **Financial Leverage**, **Financial Modelling & Forecasting**, **Financial Analysis** Techniques, **Financial Data** Analysis Concepts & Process, **Financial & Accounting** Management, **Financial Planning** Techniques, **Cost** Optimization, Effective **Budgeting & Cost** Control, Planning & Forecasting **Cost**, **Economic Cost** Analysis, Evaluating **Cost & Revenue**, **Budgeting & Cost** Control, **Revenues & Profit** Margins, **Investment & Strategic** Planning, **Cash Flow**, **Corporate Finance**, **Investment & Asset** Management, **Operation** Management, **Debt Restructuring**, **Budgeting & Risk** Management, **Master Planning**, **Annual Costs & Expenses** Reduction, **Sales & Profit** Average Increase, **Budgeting & Cost** Control, **Budget Forecasting**, **Risk** Analysis & Management, **Business Process** Analysis & **Modelling**, **Strategic** Management, **Foreign Exchange**, **Trading**, **Market & Financial** Analysis, **Business Planning**, **Total Productivity** Measurement & Improvement, **Project** Implementation, **Cost Control & Resource** Allocation Management, **Productivity** Enhancement, **International Treasury** Management, **Procurement & Stock** Management, **Return on Capital**, **Discounted Cash** Flows, **Equity Profitability** Analysis, **Credit** Analysis, **Vendor Invoice** Processing & Management, **Microsoft Dynamics** and **ERP** System.

During his career life, Mr. Osama had occupied several important positions such as being the **Group CEO**, **Chief Executive Officer**, **Chief Financial Officer**, **Deputy General Manager**, **Acting General Manager**, **Accounting Department Head**, **Financial Manager**, **Accounting Manager**, **Senior Accountant**, **Accountant**, **Cashier Supervisor**, **Financial Consultant**, **Financial Trainer/Lecturer**, **Group Finance Consultant**, **External Auditor**, **Tax Calculation Expert** and **Cashier** of HS Group, Almas/Murad Group, Canadian Aluminum Industries, Gulf Food Co. Ltd., Silver Establishment, Musallam Establishment, Zahawani, Al-Naji, Basamat Center, Al Jazira, Al Ramiz International Group, Subhi Abu Gallous Co. and Rum Alladin Engineering Industries Co.

Mr. Osama has a **Bachelor's degree** in **Accounting**, holds **MBA** and currently enrolled for **Professional Doctorate of Business Administration (DBA)**. Further, he is also a **Certified Trainer**, a **Certified Public Accountant (CPA)**, a **Certified Internal Verifier/Assessor/Trainer** by the **Institute of Leadership & Management (ILM)**, a **Board Member** and has wide range of published reports and journal articles in banking consulting and economic publications. He has further delivered numerous trainings, courses, seminars, conferences and workshops globally.

Training Methodology

All our Courses are including **Hands-on Practical Sessions** using equipment, State-of-the-Art Simulators, Drawings, Case Studies, Videos and Exercises. The courses include the following training methodologies as a percentage of the total tuition hours:-

- 30% Lectures
- 20% Practical Workshops & Work Presentations
- 30% Hands-on Practical Exercises & Case Studies
- 20% Simulators (Hardware & Software) & Videos

In an unlikely event, the course instructor may modify the above training methodology before or during the course for technical reasons.

Accommodation

Accommodation is not included in the course fees. However, any accommodation required can be arranged at the time of booking.

Course Fee

US\$ 5,500 per Delegate + **VAT**. This rate includes H-STK® (Haward Smart Training Kit), buffet lunch, coffee/tea on arrival, morning & afternoon of each day.

Course Program

The following program is planned for this course. However, the course instructor(s) may modify this program before or during the workshop for technical reasons with no prior notice to participants. Nevertheless, the course objectives will always be met:

Day 1: Sunday, 26th of October 2025

0730 – 0800	<i>Registration & Coffee</i>
0800 – 0815	<i>Welcome & Introduction</i>
0815 – 0830	PRE-TEST
0830 – 0930	Introduction to Tax Litigation & Appeals <i>Understanding Tax Disputes • Scope of Litigation & Appeals • Parties Involved in Tax Disputes • Role of the Controller in Litigation</i>
0930 – 0945	<i>Break</i>
0945 – 1030	Tax Law Framework & Governing Authorities <i>Domestic Tax Law Structure • Tax Authority Roles (e.g., MoF, FTA) • Judicial Hierarchy in Tax Cases • Relationship Between Tax Authority & Judiciary</i>
1030 – 1130	Causes & Classification of Tax Disputes <i>Assessment-Based Disputes • Procedural versus Substantive Disputes • Civil versus Criminal Tax Issues • Common Corporate Tax Challenges</i>
1130 – 1215	Legal Rights & Obligations of Taxpayers <i>Right to Appeal • Time Limits for Appeals • Disclosure & Transparency Obligations • Taxpayer Protections Under Law</i>
1215 – 1230	<i>Break</i>
1230 – 1330	Structure & Jurisdiction of Tax Tribunals & Courts <i>Tax Appeal Committees • Administrative Courts • Higher Appellate Bodies • Jurisdictional Thresholds</i>

1330 – 1420	Overview of Tax Penalties & Sanctions <i>Types of Tax Penalties • Calculation Methods • Aggravating versus Mitigating Factors • Legal Defenses Against Penalties</i>
1420 – 1430	Recap <i>Using this Course Overview, the Instructor(s) will Brief Participants about the Topics that were Discussed Today and Advise Them of the Topics to be Discussed Tomorrow</i>
1430	<i>Lunch & End of Day One</i>

Day 2: Monday, 27th of October 2025

0730 – 0830	Stages of Tax Dispute Lifecycle <i>Pre-Assessment Stage • Assessment & Audit Notice • Filing Objections • Appeal Hearings</i>
0830 – 0930	Filing & Documentation of Tax Appeals <i>Required Forms & Formats • Statement of Grounds of Appeal • Timeframes for Submission • Proper Referencing of Tax Laws</i>
0930 – 0945	<i>Break</i>
0945 – 1100	Taxpayer Objection Process to Tax Authorities <i>Drafting Objections • Responding to Tax Assessments • Supporting Evidence Submission • Liaison with Tax Authority Officers</i>
1100 – 1215	Tax Audit Reports & Controllers' Review <i>Structure of Audit Reports • Assessing Findings versus Records • Cross-Examination of Audit Data • Identifying Errors & Misinterpretations</i>
1215 – 1230	<i>Break</i>
1230 – 1330	Role of Controllers in Internal Review & Legal Support <i>Coordination With Legal Team • Reconciling Accounting Records • Highlighting Justifications • Preparing Internal Position Papers</i>
1330 – 1420	Common Errors & Omissions in Tax Appeal Filings <i>Incomplete Documentation • Missed Deadlines • Inadequate Legal Reasoning • Weak Financial Linkages</i>
1420 – 1430	Recap <i>Using this Course Overview, the Instructor(s) will Brief Participants about the Topics that were Discussed Today and Advise Them of the Topics to be Discussed Tomorrow</i>
1430	<i>Lunch & End of Day Two</i>

Day 3: Tuesday, 28th of October 2025

0730 – 0830	Building a Strong Case: Evidence & Argumentation <i>Financial Evidence Preparation • Use of Expert Opinions • Legal Precedent Citation • Risk-Reward Analysis</i>
0830 – 0930	Legal Counsel Engagement & Coordination <i>Selecting Tax Counsel • Managing Counsel Communication • Sharing Financial Data Securely • Billing & Engagement Letter Terms</i>
0930 – 0945	<i>Break</i>
0945 – 1100	Representation in Tax Hearings & Tribunals <i>Preparing the Appeal Team • Opening Statements • Technical Financial Presentations • Post-Hearing Submissions</i>
1100 – 1215	Negotiation & Settlement Options in Tax Disputes <i>Principles of Alternative Dispute Resolution (ADR) • Pros & Cons of Settlement • Drafting Settlement Agreements • Closure & Compliance Processes</i>
1215 – 1230	<i>Break</i>

1230 – 1330	Tracking Ongoing Tax Appeals & Litigation Timelines Litigation Tracking Tools • Status Reporting to Finance Management • Escalation Protocols • Budgeting for Tax Litigation
1330 – 1420	Managing Reputational & Financial Risks Disclosure to Shareholders • Internal Controls for Dispute Tracking • Preventing Recurrence • Legal Reserve Accounting
1420 – 1430	Recap Using this Course Overview, the Instructor(s) will Brief Participants about the Topics that were Discussed Today and Advise Them of the Topics to be Discussed Tomorrow
1430	Lunch & End of Day Three

Day 4: Wednesday, 29th of October 2025

0730 – 0830	Handling Transfer Pricing Disputes Transfer Pricing Principles • OECD Guidelines • Documentation Requirements • Dealing with TP Audits
0830 – 0930	International Tax Appeals & Treaty Disputes Double Taxation Treaties • MAP (Mutual Agreement Procedures) • OECD versus UN Model Conventions • Bilateral Tax Dispute Resolution
0930 – 0945	Break
0945 – 1100	VAT/GST Appeals & Litigation Trends Common Indirect Tax Disputes • Input Tax Credit Issues • Reverse Charge Complexities • VAT Fraud and Evasion Cases
1100 – 1215	Appeals Involving Withholding Tax & Cross-Border Payments Taxability of Service Payments • Treaty Relief Mechanisms • Payment Gross-Up Clauses • Procedural Barriers in Foreign Tax Credits
1215 – 1230	Break
1230 – 1330	Tax Fraud Allegations & Criminal Litigation Exposure Indicators of Tax Evasion • Role of Forensic Controllers • Evidence Handling in Fraud Trials • Penalties & Settlement
1330 – 1420	Coordinating Global Counsel & Advisors Managing Multi-Jurisdictional Litigation • Interpreting Cross-Border Tax Assessments • Use of Big 4 Tax Networks • Controller's Support in Global Tax Cases
1420 – 1430	Recap Using this Course Overview, the Instructor(s) will Brief Participants about the Topics that were Discussed Today and Advise Them of the Topics to be Discussed Tomorrow
1430	Lunch & End of Day Four

Day 5: Thursday, 30th of October 2025

0730 – 0830	Implementing Tax Risk Management Frameworks Identifying Litigation-Prone Areas • Internal Risk Controls • Legal versus Tax Exposure Mapping • Compliance Matrix
0830 – 0930	Internal Audit & Litigation Prevention Conducting Tax Risk Audits • Testing Appeal Preparedness • Mock Tax Authority Reviews • Audit Reporting to Board
0930 – 0945	Break
0945 – 1100	Tax Governance & Documentation Standards Maintaining Litigation Files • Document Version Control • Email & Memo Trail • Legal-Hold Protocols

1100 – 1215	Automation & Tools for Litigation Management Tax Litigation Tracking Systems • AI Tools for Legal Research • Dashboards for Appeal Deadlines • Digital Documentation
1215 – 1230	Break
1230 – 1300	Reporting & Disclosure of Contingent Tax Liabilities Accounting Standards (e.g., IAS 37) • Disclosures in Financial Statements • Controller's Role in Provisions • Internal Policy Guidelines
1300 – 1345	Case Studies & Simulated Appeal Exercises Real-World Tax Litigation Examples • Simulated Hearing Practice • Group Presentations • Lessons Learned Summary
1345 – 1400	Course Conclusion Using this Course Overview, the Instructor(s) will Brief Participants about Topics that were Covered During the Course
1400 – 1415	POST-TEST
1415 – 1430	Presentation of Course Certificates
1430	Lunch & End of Course

Practical Sessions

This practical and highly-interactive course includes real-life case studies and exercises:-



Course Coordinator

Mari Nakintu, Tel: +971 2 30 91 714, Email: mari1@haward.org