



30 September 2025

International taxation

Open seminar

Our full-day intensive training will provide a detailed overview of the on DTT applications, its structure, provisions such as Beneficial Ownership and the Principal Purpose Test (PPT).

To make it practical, the training includes recent Mongolian tax dispute cases that illustrate how BO and the GAAR/PPT are being challenged by tax authorities.

As tax authorities increasingly focus on the application of DTT and related anti-abuse provisions, this training is particularly valuable for professionals who need to understand and apply treaty rules accurate and effectively.

Training agenda

- 1 MTA emerging challenges in DTT applications
- 2 Concept of Beneficial Owner (BO) and application in practice
- 3 Mongolian GAAP rule and application in practice
- 4 PPT concept and application in practice
- 5 Recent Mongolian tax dispute cases on BO and GAAR/PPT

Who is this training for?

- Chief financial officers
- Financial controllers
- Specialists in M&A (restructuring)
- Company lawyers
- General Accountants
- Finance and Tax managers

Tutors



Aliya Ibrayeva

Director,
Tax and Legal Services

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Aliya is a Director leading the International Tax Practice at PwC Kazakhstan and Eurasia, with 19 years of experience in international taxation. She works on BEPS implementation projects in the Eurasia region, international tax structuring and planning, international tax consulting, IPO and securities buy-back tax advice, and training services. She graduated with a Master's degree in Public Administration from the Kazakhstan Institute of Management Economics and Forecasting and a Master's degree in Finance and Strategic Leadership from EADA Barcelona Business School. She holds an ADIT qualification and has experience working at PwC US.



Enkhzul Jambal

Senior Manager,
Tax Services

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Enkhzul is a Senior Tax Manager at PwC Mongolia. She has 17 years of experience in taxation, accounting, and fiscal policy. She provides clients with tax legislation, international tax advice, financial reporting, and training services. She graduated from the University of Melbourne with a Master's degree in Finance and from the National University of Mongolia with a Master's degree in Accounting and a Bachelor's degree in Finance. She holds professional qualifications of ACCA, Certified Public Accountant (CPA) of Mongolia, and Certified Tax Advisor (CPTA) of Mongolia.

Workshop Details

Workshop Fee

850,000 MNT + VAT

Registration:

Time: 09:15

Workshop:

9:30 – 17:00

Language:

English, Mongolian

Location:

4F, Ayud Tower

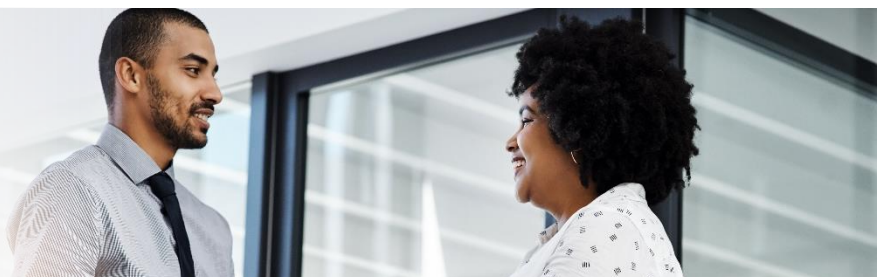
Certificate:

PwC attendance
certificate

Registration:

[CLICK HERE](#)

Celebrating **15 years**
of success in Mongolia,
more to come!



Contact information

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A complete calendar of training courses can also be found on our website: [HERE](#)

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