

Principles of International Taxation



Third Edition

Angela Miller FCA CTA
Lynne Oats PhD

Bloomsbury Professional

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Wolfgang Guggemos

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Principles of International Taxation Lynne Oats, 2021-09-30 The book provides a clear introduction to international taxation and presents its material in a global context explaining policy legal issues and planning points central to taxation issues primarily from the viewpoint of a multinational group of companies. It uses examples and diagrams throughout to aid the reader's understanding and offers more in depth material on many important areas of the subject. Traditionally published every 2 years in both print and digital formats this content is a core requirement for student reading lists at both undergraduate and post graduate level. Fully updated to cover all new tax legislation and developments in light of the OECD BEPS project implementation key areas to be included in this new edition are changes proposed by BEPS 2.0 in relation to taxation and the digital economy including Pillar Two and the proposed new UN Model Article 12B further progress on the implantation of OECD Base Erosion and Profit Shifting implementation including an update on the implementation of BEPS recommendations including artificial avoidance of permanent establishment status and prevention of treaty abuse the implementation of transfer pricing documentation and country by country reporting multilateral instrument implementation the impact of Covid 19 on international taxation further developments in European direct taxation including the transparency package directives on anti tax avoidance and the common corporate tax base and state aid cases Apple in particular and updates to the Directive on Administrative Cooperation and the new communication on Business Taxation for the 21st Century Proposals in relation to the taxation of digital business in particular the OECD's unified approach and the UN modifications to the Model Double Taxation Convention Proposals for a global minimum corporate tax rate to curb base erosion and tax competition

Advanced Introduction to International Tax Law Reuven S Avi-Yonah, 2024-11-08 This thoroughly revised third edition of the Advanced Introduction to International Tax Law provides an incisive overview of the key issues surrounding taxation and international law. Reuven S Avi Yonah explores the nuances of varying taxation systems using relevant and current case studies

International Tax Primer Brian J. Arnold, 2016-01-21 International Tax Primer provides an introduction to the policies that countries seek to advance with their international tax rules with numerous examples drawn from the practices of both developed and developing countries. This third edition has been expanded substantially due to the major developments that have occurred since the second edition of this indispensable resource appeared in 2004 not least the fact that innumerable small and medium sized firms as well as individuals now engage in cross border transactions that cause them and their tax advisers to confront international tax issues on a regular basis. Moreover as the countries of the world have become increasingly integrated economically the importance of the major issues that a country must confront in designing its international tax rules and in coordinating those rules with the tax systems of its trading partners has mushroomed. The book strikes a balance between the specific and the general by illustrating the fundamental principles and structure of international tax with frequent reference to actual practice in a variety of countries.

Coverage includes the following role of the tax adviser in planning international transactions taxation of residents on foreign income and of non residents on domestic income mechanisms used to mitigate the risks to taxpayers of international double taxation transfer pricing rules to prevent the avoidance of tax by multinational corporations anti avoidance measures dealing with tax havens treaty shopping and other offensive tax planning activities overview and analysis of the provisions of bilateral tax treaties and the OECD and UN Model Treaties on which they are generally based and challenges posed by taxation of income derived from the digital economy New material in the third edition includes analysis of the OECD's initiative against base erosion and profit shifting BEPS tax aspects of hybrid entities and financial instruments and taxation of fees for technical services as proposed under the UN Model Treaty Although of greatest value to tax practitioners and government officials confronting international tax for the first time this book is sure to continue in use by tax professionals at every level of experience and on a worldwide basis

Beneficial Ownership in International Taxation Kuźnicki, Błażej, 2022-08-12

This authoritative book provides a structural global view of evolving judicial and doctrinal trends in the understanding of beneficial ownership in international taxation B a ej Ku niacki presents a route towards an international autonomous meaning of beneficial ownership while also offering a comprehensive explanation of the divergent understandings and tax policy arguments underpinning its continuing ambiguity

Justice, Equality and Tax Law Nevia Čičin-Šain, Mario

Riedl, 2022-10-05 An in depth analysis of the specific aspects of justice equality and tax law Justice Equality and Tax Law is a topic that is both old and new at the same time Even if the society changes the demands that tax needs to be just and equal seem to be immutable What changes of course is the perception of the content of those demands International taxation post BEPS has been fraught with new challenges that warranted urgent responses These challenges were mainly provoked by the unprecedented rise of the digital economy which truly marked a change in the way business is conducted how value is created and how goods and services are produced and consumed Digitalization in turn had repercussions on all aspects of taxation direct taxation indirect taxation and even tax procedures For instance the quest for more justice and equality in profit taxes was the reason why in October 2021 a historical deal based on a two pillar solution to address the tax challenges arising from the digitalization of the economy was negotiated within the OECD G20 Inclusive Framework on Base Erosion and Profit Shifting and agreed upon by 137 member countries It was also the motive behind the shift from a typical vendor collection model to an intermediary collection model supported by centralized registration points in indirect taxes notably the VAT GST Abundant data from the European Union or the OECD signalized an ever increasing gap between expected VAT revenues and VAT actually collected making it obvious that the classical system of VAT GST collection was unable to respond to challenges posed by the digital economy Therefore new solutions based on the participation of digital platforms as intermediaries had been introduced Finally new technologies such as blockchain paved new avenues in enhancing tax compliance In this context this volume entitled Justice Equality and Tax Law contains not only a selection of the best master s

theses of the full time LL M programme in 2021 2022 but also represents an in depth analysis of various aspects of this evergreen topic **A Treatise on the Specific Performance of Contracts ... Third edition, by the author, and E. P. Fry** Edward FRY (Right Hon. Sir),1901 **International Tax** Lynette Olivier,Michael Honiball,2005 This edition provides a thorough understanding of international income tax from a South African perspective It deals in detail with Controlled foreign companies foreign dividends double taxation agreements exchange control restrictions tax havens **Taxes International** ,1985 **European Union Corporate Tax Law** Christiana HJI Panayi,2021-06-17 What is the impact of European Union law on Member State corporate tax systems and the cross border activities of companies **The Law Times** ,1886 **The Yale Review** George Park Fisher,George Burton Adams,Henry Walcott Farnam,Arthur Twining Hadley,John Christopher Schwab,William Fremont Blackman,Edward Gaylord Bourne,Irving Fisher,Henry Crosby Emery,Wilbur Lucius Cross,1911 **The Journal of International Taxation** ,2000 **Cardinal Rules of Legal Interpretation** Edward Beal,1896 **Conveyancing, Settled Land & Trustee Acts, and Other Acts Affecting Conveyancing** Henry John Hood,Henry William Challis,1901 *Precedents of Conditions of Sale of Real Estate, Reversions, Policies, &c* Frederick Edward Farrer,1902 *Catalog of Copyright Entries. Third Series* Library of Congress. Copyright Office,1976 *Land Charges Acts, 1888 and 1900* Ernest W. Eaton,J. P. Purceell,1901 **The Lands Clauses Acts** Arthur Jepson,1900 **The Bulletin of the National Tax Association** National Tax Association,1919 **Company Law** Sir Francis Beaufort Palmer,1901

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