

Principles of International Taxation



Ninth Edition

Lynne Oats

B L O O M S B U R Y

Principles Of International Taxation Fourth Edition

Michael Honiball



Principles Of International Taxation Fourth Edition:

International Tax Primer Brian J. Arnold, 2019-01-14 Tax practitioners multinational companies and national tax authorities have relied on this indispensable resource since its first edition nearly two decades ago The Primer provides the reader with an introductory analysis of the major issues that a country must confront in designing its international tax rules and coordinating those rules with the tax systems of its trading partners with numerous examples drawn from the practices of both developed and developing countries This fourth edition follows the format and sequence of earlier editions but adds details on ongoing developments surrounding the Organisation for Economic Co operation and Development s OECD base erosion and profit shifting BEPS project updates to the OECD and UN Model Conventions the 2017 US tax reform the EU anti tax avoidance directive and continuing issues concerning the digital economy 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 nonresidents 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 An extensive glossary of international tax terms is included With examples of typical international tax planning techniques and descriptions of the work of the major international organizations that play an important role with respect to international tax the Primer remains the preeminent first recourse for professionals in the field Although of greatest value to students 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

The International Taxation System Andrew Lymer, John Hasseldine, 2002-08-31 International taxation is a vital issue for a growing number of business and individuals across the world The need to understand how the international system of taxation works is therefore a subject of importance to many people The International Taxation System provides this understanding by bringing together experts from the most important fields in the subject who have each authored chapters especially for this book They each provide brief structured and easy to understand explanations of the key concepts edited together into one volume to provide a unique very readable guide to the field While this text is aimed at masters or advanced undergraduate level students it will also be of interest to those requiring a professional understanding of the topic Each chapter introduces a different aspect of the international taxation system explains the important issues to be understood in each case and provides suggestions for discussion and further reading

Transfer Pricing and the Arm's Length Principle in International Tax Law Jens Wittendorff, 2010-01-01 The arm s

length principle serves as the domestic and international standard to evaluate transfer prices between members of multinational enterprises for tax purposes The OECD has adopted the arm's length principle in Article 9 of its Model Income Tax Convention in order to ensure that transfer prices between members of multinational enterprises correspond to those that would have been agreed between independent enterprises under comparable circumstances The arm's length principle provides the legal framework for governments to have their fair share of taxes and for enterprises to avoid double taxation on their profits This timely book contains a comparative analysis of the legal basis for the arm's length principle and the contents of the arm's length rules in US tax law as well as in the OECD Model Tax Convention and Transfer Pricing Guidelines It includes a thorough review of international case law on transfer pricing from the United States Canada Australia United Kingdom Germany France the Netherlands Denmark Sweden and Norway The book ends with an analysis of the issues associated with the application of the arm's length principle for multinational enterprises in a global economy

The International Tax Law Concept of Dividend Marjaana Helminen, 2017-05-02 The distribution of profits between corporations resident in different jurisdictions gives rise to both significant tax planning opportunities and tax risks As cross border transactions between corporations grow in number and complexity the question of how a profit distribution is classified for corporate income tax purposes becomes increasingly important particularly in the context of issues such as double taxation non taxation and tax neutrality The OECD BEPS project has only increased the relevance This unique work discusses the international tax law rules determining which transactions may be classified and taxed as dividends and how possible classification conflicts may be resolved The author examines the tax classification of various inter corporate transactions including Payments made under dividend stripping arrangements Fictitious profit distributions Economic benefits in the context of transfer pricing Returns on debt equity hybrids Interest payments in thin capitalization situations and distributions following liquidation The analysis of each transaction refers to international tax law Most weight is given to tax treaties and EU tax law including the BEPS development The approaches adopted in different states national tax law are covered by a more general analysis The comprehensive coverage and the practical nature of *The International Tax Law Concept of Dividend* make it an essential acquisition for tax practitioners researchers and tax libraries worldwide

International Tax Michael Honiball, 2011-03-15 This book is not merely a new edition but a complete and significantly expanded rewrite It comprises over 900 pages of expert and in depth exposition of this complex subject that has become so important in the modern global economy Already established over four previous editions as the pre eminent work on the subject it is a must own book for all students and practitioners of tax whether from a legal business or accounting perspective Professor Lynette Olivier and Michael Honiball are without peer in their understanding and clarity in this highly specialised field Five new chapters have been added on Taxation of individuals Taxation of Companies and Dividends Taxation of Partnerships Cross border VAT and Interpretation of Statutes *Taxing Ourselves, fourth edition* Joel

Slemrod, Jon Bakija, 2008-02-08 The fourth edition of a popular guide to the key issues in tax reform discussing the current system and alternative proposals clearly and without a political agenda As Albert Einstein may or may not have said The hardest thing in the world to understand is the income tax Indeed to follow the debate over tax reform the interested citizen is forced to choose between misleading sound bites and academic treatises Taxing Ourselves bridges the gap between the two by discussing the key issues clearly and without a political agenda Should the federal income tax be replaced with a flat tax or sales tax Should it be left in place and reformed Can tax cuts stimulate the economy or will higher deficits undermine any economic benefit Authors and tax policy experts Joel Slemrod and Jon Bakija lay out in accessible language what is known and not known about how taxes affect the economy offer guidelines for evaluating tax systems and provide enough information to assess both the current income tax system and the leading proposals to reform or replace it including the flat tax and the consumption tax The fourth edition of this popular guide has been extensively revised to incorporate the latest information covering such recent developments as the Bush administration's tax cuts which expire in 2011 and the alternatives proposed by the President's Advisory Panel on Federal Tax Reform Slemrod and Bakija provide us with the knowledge and the tools including an invaluable voter's guide to the tax policy debate to make our own informed choices about how we should tax ourselves

Beneficial Ownership in International Taxation Kuźniacki, 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 Błażej Kuźniacki 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

Law of the Internet, 4th Edition Delta & Matsuura, 2017-01-01 Law of the Internet Fourth Edition is a two volume up to date legal resource covering electronic commerce and online contracts privacy and network security intellectual property and online content management secure electronic transactions cryptography and digital signatures protecting intellectual property online through link licenses frame control and other methods online financial services and securities transactions antitrust and other liability The Law of the Internet Fourth Edition quickly and easily gives you everything you need to provide expert counsel on Privacy laws and the Internet Ensuring secure electronic transactions cryptography and digital signatures Protecting intellectual property online patents trademarks and copyright Electronic commerce and contracting Online financial services and electronic payments Antitrust issues including pricing bundling and tying Internal network security Taxation of electronic commerce Jurisdiction in Cyberspace Defamation and the Internet Obscene and indecent materials on the Internet Regulation of Internet access and interoperability The authors George B Delta and Jeffrey H Matsuura two Internet legal experts who advise America's top high tech companies demonstrate exactly how courts legislators and treaties expand traditional law into the new context of the Internet and its commercial applications with all the citations you'll need The Law of the Internet also brings you up to date

on all of the recent legal commercial and technical issues surrounding the Internet and provides you with the knowledge to thrive in the digital marketplace Special features of this two volume resource include timesaving checklists and references to online resources

Law and Ethics in Global Business Brian Nelson, 2013-10-31 This book provides comprehensive and above all business focused guidance on the fundamentals of business law and how they should be integrated into ethical and effective business decisions It concentrates on legal principles and thereby is able to articulate the impact of global business law and its international applications providing a comprehensive overview of the legal and ethical principles which both facilitate and regulate corporate business This is an ambitious undertaking yet arguably no more ambitious than the projects undertaken by global business leaders making business decisions around the world The author combines the expertise of a long term blue chip law background with the insights of an experienced business educator Law and Ethics in Global Business is both a comprehensive course book for MBA study and an invaluable business reference source for any executive involved in global business

Taxmann's International Taxation - A Compendium | 5,200+ Pages | 200+ Experts | 137 Articles | 4 Volumes | 4th Edition The Chamber of Tax Consultants, 2021-02-10 CTC's International Tax Compendium is a collection of incisive in depth articles on international taxation which serves as a reference manual and indeed a practice guide for its readers The current edition of the compendium is more current more incisive covers a broader range of topics and like its previous three editions promises to be another very useful tool for the following Tax Professionals both in India and Overseas Judiciary and Tax administrators ought to find this a useful reference point both for technical analysis as well as for understanding the right perspective in which to view some of the international tax developments of the recent past This compendium will equip its readers with better knowledge and practical examples to be able to serve their clients better The current edition of the compendium is a comprehensive four volumes set containing approximately 5 200 pages covering all major topics on the subject of International Taxation such as Amendments made in the Income tax Act 1961 Changes introduced in the OECD Model Tax Convention 2017 Updates introduced in the OECD Model Commentary in 2017 Updates introduced in UN Model Tax Convention in 2017 Global Focus on combating Tax Evasion Initiation of various Anti Avoidance Measure and tightening of Anti Money Laundering Laws Implementation of Multilateral Instruments pursuant to the publication of the BEPS Action Plan Reports in October 2015 The Present Publications is the 4th Edition covering 137 Articles authored by 200 Experts This Compendium is a balanced collection of articles by recognised experts in the field by young as well as eminent professionals and also by experienced and knowledgeable Commissioners of Income tax Senior Ex Revenue Officials This book is divided into four volumes and their contents volume wise are listed below Volume 1 2 contains articles explaining the following Theme basic concepts of Double Tax Avoidance Agreements Various Articles of Model Tax Convention Specific provisions of the Domestic Law dealing with the Taxation of Non Residents and Cross Border Transactions Volume 3 contains industry specific articles such as Taxation of Telecom Sector Broadcasting Telecasting

industries Electronic Commerce Foreign Banks Offshore Funds FII s etc Volume 4 contains articles on the following FEMA and other Domestic Laws such as Prevention of Money Laundering Act Foreign Contribution Regulation Act Black Money Act Benami Law Various Anti Avoidance Measures other specialised articles

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