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Second edition, June 2015

Income taxes



Pwc Income Tax Guide 2015

Sigrid Hemels, Kazuko Goto

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Tax Incentives for the Creative Industries Sigrid Hemels, Kazuko Goto, 2017-01-04 This book combines insights from cultural economics public finance and tax law providing an accessible and comprehensive introduction in the application of tax incentives for the creative industries It does not have a single country focus but instead uses the perspective and examples of various countries around the world The book starts with a theoretical part introducing the concepts of creative industries and of tax incentives how can the creative industries be defined why do governments support the creative industries and how can tax incentives be applied as policy instrument In the globalized and digitalized world in which the creative industries operate restrictions imposed by guidelines on harmful tax competition and state aid and regulations influencing the im possibility of applying tax incentives in cross border situations have a great impact For that reason these legal concepts are discussed as well in the theoretical part Globalization also gives rise to questions on the cross border application of tax incentives The example of cross border giving is discussed in this respect The theoretical part is followed by a part that focuses on tax incentives for specific sectors of the creative industries museums and cultural heritage the audiovisual industries film tv and videogames the art market copyright and artists This part uses insightful examples from various countries to illustrate the application of these tax incentives As the book takes both an academic and a practical approach it is of relevance to researchers students policy makers and readers involved in the creative industries

International Taxation of Banking John Abrahamson, 2020-02-20 Banking is an increasingly global business with a complex network of international transactions within multinational groups and with international customers This book provides a thorough practical analysis of international taxation issues as they affect the banking industry Thoroughly explaining banking s significant benefits and risks and its taxable activities the book s broad scope examines such issues as the following taxation of dividends and branch profits derived from other countries transfer pricing and branch profit attribution taxation of global trading activities tax risk management provision of services and intangible property within multinational groups taxation treatment of research and development expenses availability of tax incentives such as patent box tax regimes swaps and other derivatives loan provisions and debt restructuring financial technology FinTech group treasury interest flows and thin capitalisation tax havens and controlled foreign companies and taxation policy developments and trends Case studies show how international tax analysis can be applied to specific examples The Organisation for Economic Co operation and Development Base Erosion and Profit Shifting OECD BEPS measures and how they apply to banking taxation are discussed The related provisions of the OECD Model Tax Convention are analysed in detail The banking industry is characterised by rapid change including increased diversification with new banking products and services and the increasing significance of activities such as shadow banking outside current regulatory regimes For all these reasons and

more this book will prove to be an invaluable springboard for problem solving and mastering international taxation issues arising from banking The book will be welcomed by corporate counsel banking law practitioners and all professionals officials and academics concerned with finance and its tax ramifications Revenue Statistics in Latin America and the Caribbean 2017 OECD, Inter-American Center of Tax Administrations, Inter-American Development Bank, Economic Commission for Latin America and the Caribbean, 2017-03-23 The Revenue Statistics in Latin America and the Caribbean publication compiles comparable tax revenue statistics for a number of Latin American and Caribbean economies The model is the OECD Revenue Statistics database backed by a well established OECD methodology Multilatinas Veneta Andonova, Mauricio Losada-Otálora, 2017-11-16 This book studies the internationalization strategies of multilatinas drawing on a survey based investigation into their organizational resources and business environment **Proceedings of IAC-MEM** 2016 collective of authors, 2016-04-05 International Academic Conference on Management Economics and Marketing in Budapest Hungary 2016 IAC MEM 2016 Friday Saturday April 15 16 2016 Taxation in the Digital Economy Nella Hendrivetty, Chris Evans, Chul Ju Kim, Farhad Taghizadeh-Hesary, 2022-07-11 A robust and efficient tax administration in a modern tax system requires effective tax policies and legislation Policy frameworks should cover all aspects of tax administration and include the essential processes of capturing processing analyzing and responding to information provided by taxpayers and others concerning taxpayers affairs By far the greatest challenges facing tax administrations in all countries are those posed by the continuing developments in the digital economy Whereas societies are grappling to come to terms with the transitions from the third industrial or digital revolutions revenue authorities grapple with the consequences for the sustainability of their tax bases and the efficient administration and collection of taxes This book presents a critical review of the status of tax systems in Asia and the Pacific in the era of the digital economy The book suggests how countries can maximize their domestic resource mobilization when confronted by the challenges that digitalization inevitably produces as well as how they can best harness or take advantage of aspects of digitalization to serve their own needs The full implications of the COVID 19 crisis are still too uncertain to predict but it is clear that the crisis will accelerate the trend towards digitalization and also increase pressures on public finances This in turn may shape the preference for and the nature of both multilateral and unilateral responses to the tax challenges posed by digitalization and the need to address them This book will be a timely reference for those researching on taxation in digital economy and for policy makers The Open Access version of this book available at www taylorfrancis com has been made available under a Creative Commons Attribution Non Commercial No Derivatives 4 0 license Handbook of Research on Theory and Practice of Financial Crimes Rafay, Abdul, 2021-03-18 Black money and financial crime are emerging global phenomena During the last few decades corrupt financial practices were increasingly being monitored in many countries around the globe Among a large number of problems is a lack of general awareness about all these issues among various stakeholders including researchers and practitioners The

Handbook of Research on Theory and Practice of Financial Crimes is a critical scholarly research publication that provides comprehensive research on all aspects of black money and financial crime in individual organizational and societal experiences. The book further examines the implications of white collar crime and practices to enhance forensic audits on financial fraud and the effects on tax enforcement Featuring a wide range of topics such as ethical leadership cybercrime and blockchain this book is ideal for policymakers academicians business professionals managers IT specialists researchers and **International Taxation of Energy Production and Distribution** John Abrahamson, 2018-04-20 Energy is a major global industry with rapid ongoing changes in areas such as carbon taxes emissions trading regimes and the development of renewable energy The cross border nature of the industry calls for the thorough expert and up to date analysis provided in this timely and practical book Taking a down to earth problem solving approach to policy and practice in the field worldwide the author focuses on the international tax framework and the tax regimes in leading energy producing and consuming countries The book introduces and analyses significant international tax issues related to energy production and distribution extending from the tax regime in the country where the oil gas or coal exploration and production activities are located through to cross border transportation using pipelines tankers and bulk carriers to the taxation of power stations and electricity transmission and distribution networks The taxation issues covered include the following upstream oil and gas and mining taxes incentives for renewable energy carbon taxes and emission trading regimes dividend interest and royalty flows foreign tax credits permanent establishments mergers and acquisitions taxation issues for derivatives and hedging transfer pricing regional purchasing marketing service and intangible property structures free trade agreements and customs unions dispute resolution and tax administration and risk management Detailed updates are included on the most recent international tax developments affecting the energy industry including the OECD Action Plan on Base Erosion and Profit Shifting BEPS and the 2017 OECD Transfer Pricing Guidelines Case studies offer an opportunity to apply international tax analysis to specific examples and gain practice in identifying and discussing relevant international taxation issues This book will be of significant value to corporate tax managers and in house counsel together with accountants lawyers economists government officials and academics connected with the energy industry and related international taxation issues

Evolution of APA Regime Kuldeep Sharma, 2021-07-19 Advance pricing agreements or arrangements APAs are designed as a dispute prevention mechanism for transfer pricing related issues and provide certainty to taxpayers on taxation of cross border transactions Since the APA procedure was introduced by tax authorities in the late 1980s it has gradually taken hold worldwide and evolved along several dimensions with important characteristics. This book the first exclusively dedicated to the global APA regime provides a comprehensive in depth discussion of the APA concepts and procedures in twenty five jurisdictions across Europe Asia Asia Pacific North America South America and Africa noting the particular genesis features and progress made under each programme. The analysis covers such elements as the following the types of APAs and their

characteristics the main steps involved in an APA process key advantages of APA programme and comparative study of the APA as a preferred dispute prevention mechanism over other dispute resolution mechanisms key issues observed and in practice by various APA authorities worldwide inter alia involving cost base of captive entities resolution of transfer pricing issues involving intangibles location savings joint site visits attribution of profits to PEs APAs for small businesses abbreviated procedure for renewal of APAs significance of economic nexus prior to the grant of APAs and other relevant issues exchange of APA rulings equip tax authorities to quickly identify risk areas so as to curb Base Erosion and Profits Shifting BEPS which augurs well for the APA programme and is another milestone in its evolution process APAs provide jurisdictions with an excellent platform to fostering a non adversarial tax regime. The author includes an extended case study of India's APA programme highlighting some of its conspicuous elements with equal focus on certain special characteristics of APAs in Australia Canada France Germany Ireland Korea The Netherlands Poland UK and the United States Factors influencing speedier processing and suggestions on further improvement of APA programmes are also included Numerous tables and figures illustrate all aspects associated with APAs With more economies opening up and the worldwide implementation of the OECD G20 BEPS Action Reports in an endeavour to combat BEPS access and recourse to APAs is sure to grow This invaluable book will enable tax administrations to learn from each other's experiences and help to prevent costly and time consuming transfer pricing audits and litigation for multinational enterprises. The book will be welcomed by revenue officials professionals and advisors concerned with international taxation as well as by tax law academics Taxation in a Global Digital Economy Ina Kerschner, Maryte Somare, 2017-10-04 Time to discuss anti BEPS measures around digitalization In the course of the BEPS Report on Action 1 it was concluded that there was no instantaneous need for specific rules to address base erosion and profit shifting BEPS made possible by the digitalization of enterprises and new digital businesses At the same time it was acknowledged that general measures may not suffice with the assessment of results to begin in 2020 While awaiting possible fundamental reforms of the tax framework it is time to discuss anti BEPS measures bearing in mind the peculiar features of the digital economy such as increased mobility no need for physical presence and dematerialization The Book focuses on five key areas of interest International Tax PolicyTax Treaty LawTransfer PricingIndirect Taxation IssuesEU Law Taxation in a Global Digital Economy analyses the issues and addresses the five key areas of interest from various viewpoints

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