

INTERNATIONAL TAXATION IN AN INTEGRATED WORLD

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International Taxation In An Integrated World

Doron Herman



International Taxation In An Integrated World:

International Taxation in an Integrated World Jacob A. Frenkel, Assaf Razin, Efraim Sadka, 1991 In this book the authors provide a new treatment of international taxation one that focuses on the interactions between fiscal policies of sovereign nations and the magnitude and directions of international capital and goods flow in an integrated world economy

International Taxation of Permanent Establishments Michael Kobetsky, 2011-09-15 The effects of the growth of multinational enterprises and globalization in the past fifty years have been profound and many multinational enterprises such as international banks now operate around the world through branches known as permanent establishments The business profits article Article 7 of the OECD model tax treaty attributes a multinational enterprise's business profits to a permanent establishment in a host country for tax purposes Michael Kobetsky analyses the principles for allocating the profits of multinational enterprises to permanent establishments under this article explains the shortcomings of the current arm's length principle for attributing business profits to permanent establishments and considers the alternative method of formulary apportionment for allocating business profits

Research Handbook in International Economic Law Andrew T. Guzman, A. O. Sykes, 2008-01-01 This major new work consists of carefully commissioned original and incisive contributions from leading scholars in the field of international economic law Covering a full range of topics the Handbook provides an accessible treatment of the law in each area as well as a thoughtful synthesis and discussion of related public policy issues from a broadly social science perspective

Shipowners' Limitation of Liability Miguel Correia, 2013-01-06 This book refines the features of a variety of different common law and civil law systems down to a recognizable standard CIT system identifying in the process the system's core strengths and problems as well as the factors that determine its impact on corporate behavior The author offers insightful perspectives on such crucial issues as the following corporate group members versus corporate groups as taxable entities anti abuse rules and developments in judicial anti abuse doctrines costs associated with e.g. valuation of assets compliance and administration how certain core CIT concepts are independent of tax law efficiency equity and the protection of existing property rights the firm's reaction to behavioral control instruments limitations on the use of losses depreciation and amortization rules manipulation of legal characterization and transfer of assets and income The work has an interdisciplinary approach drawing on the literatures of tax law economics corporate law accounting and business management It concludes with a set of policy guidelines that should be considered when approaching the traditionally cumbersome interaction between tax systems and corporate groups Especially valuable to the practitioner are the book's extensive graphic design solutions illustrating the subtleties of the operation of corporate tax laws Analyzing the taxation of corporate groups in a user friendly form not available in any other source this book greatly enhances the development of advanced tax planning methods that do not disrupt the economic operation of businesses Its comprehensive conceptual framework will greatly facilitate the work of those from practitioners to researchers interested in

developing a practical approach to corporate income taxation applicable at a global level Globalization, Tax Competition and the Future of Tax Systems Mr.Vito Tanzi,1996-12-01 This paper discusses the implications for tax systems of globalization of capital markets and of economies It shows the extent to which particular taxes are affected by the globalization process It speculates on future developments in this area and on tax competition **The Politics of Corporate Taxation in the European Union** Claudio Radaelli,2013-01-11 This study explores the formation of the European Union s tax policy and asks why member states did not raise objections to it The author s analysis is enriched by two further levels of inquiry Firstly he examines the Europeanization of domestic tax policy in Italy and the UK asking how domestic policy has changed and what is meant by Europeanization Secondly he puts the European Union tax policy in the wider context of tax globalization Will the liberalization of capital movement tax havens and the flexibility of multinationals in managing their taxable incomes wreck the European Union s fragile tax policies *Taxation in a Global Economy* Andreas Haufler,2001-08-23 The increasing international mobility of capital firms and consumers has begun to constrain tax policies in most OECD countries playing a major role in reforming national tax systems Haufler uses the theory of international taxation to consider the fundamental forces underlying this process covering both factor and commodity taxes as well as their interaction Topics include a variety of different international tax avoidance strategies capital flight profit shifting in multinational firms and cross border shopping by consumers Situations in which tax competition creates conflicting interests between countries are given particular consideration Haufler addresses the complex issue of coordination in different areas of tax policy with special emphasis on regional tax harmonization in the European Union Also included is a detailed introduction to recent theoretical literature **Regionalism and Globalization** Sajal Lahiri,2001 This volume brings together articles on three primary elements of globalization multilateralism regionalism and unilateralism Expert contributors investigate the substantive issues of commodity and factor trade capital movements and monetary and fiscal policies from both theoretical and empirical perspectives **The Political Economy of Capital Controls** Gunther G. Schulze,2000-05-04 A comprehensive study of capital controls assesses the existing literature and presents original research Population Aging, Fertility and Social Security Akira Yakita,2017-02-06 This book provides a comprehensive theory based analysis of current issues in population economics It addresses the most important problems caused by demographic changes using the popular overlapping generations growth model by Samuelson and Diamond Taking into account families fertility decisions it examines not only the demographic changes due to longer life expectancy but also the effects of social security policy on demography and labor supply individual retirement behaviors Conducting all analyses in a dynamic general equilibrium setting the book offers a valuable theoretical reference guide in the field of population economics **Foreign Direct Investment** Assaf Razin,Efraim Sadka,2016-06-28 The 1990s saw global flows of foreign direct investment increase some sevenfold spurring economists to explore FDI from a micro or trade based perspective Foreign Direct Investment is one

of the first books to analyze the macroeconomics of FDI treating FDI as a unique form of international capital flow between specific pairs of countries By examining the determinants of the aggregate flows of FDI at the bilateral source host country level Assaf Razin and Efraim Sadka present the first systematic global analysis of the singular features of FDI flows Drawing on a wealth of fresh data they provide new theoretical models and empirical techniques that illuminate the vital country pair characteristics that drive these flows Uniquely Foreign Direct Investment examines FDI between developed and developing countries and not just between developed countries Among many other insights the book shows that tax competition vis vis FDI need not lead to a race to the bottom Foreign Direct Investment is an essential resource for graduate students academics and policy professionals

Catching Capital Peter Dietsch, 2015-07-01 Rich people stash away trillions of dollars in tax havens like Switzerland the Cayman Islands or Singapore Multinational corporations shift their profits to low tax jurisdictions like Ireland or Panama to avoid paying tax Recent stories in the media about Apple Google Starbucks and Fiat are just the tip of the iceberg There is hardly any multinational today that respects not just the letter but also the spirit of tax laws All this becomes possible due to tax competition with countries strategically designing fiscal policy to attract capital from abroad The loopholes in national tax regimes that tax competition generates and exploits draw into question political economic life as we presently know it They undermine the fiscal autonomy of political communities and contribute to rising inequalities in income and wealth Building on a careful analysis of the ethical challenges raised by a world of tax competition this book puts forward a normative and institutional framework to regulate the practice In short individuals and corporations should pay tax in the jurisdictions of which they are members where this membership can come in degrees Moreover the strategic tax setting of states should be limited in important ways An International Tax Organisation ITO should be created to enforce the principles of tax justice The author defends this call for reform against two important objections First Dietsch refutes the suggestion that regulating tax competition is inefficient Second he argues that regulation of this sort rather than representing a constraint on national sovereignty in fact turns out to be a requirement of sovereignty in a global economy The book closes with a series of reflections on the obligations that the beneficiaries of tax competition have towards the losers both prior to any institutional reform as well as in its aftermath

Economic Policies of the New Thinking in Economics Philip Arestis, Malcolm Sawyer, 2014-10-20 The financial crisis and the great recession have generated the need for new thinking in economics and for new economic policies to secure sustainable and equitable economic development The new thinking in economics is an interdisciplinary approach to economic problems that acknowledges and respects insights and analyses from other disciplines and recognizes complexity and evolutionary theory as relevant for understanding economic systems and economic behaviour New Economics is concerned with institutional behaviour expectations and uncertainty as opposed to traditional economics with its emphasis on equilibrium mathematical formalism and deterministic solutions With the financial crisis brought on by the unrestrained pursuit of personal and corporate profit sanctioned by traditional economics this is an

opportune moment to establish a new way of approaching economic understanding based on new economic theory It is also a good time to instigate new ideas on the approach to economic policy across a wide range of areas such as macroeconomic and global governance employment and unemployment social security and pensions This book is devoted to developing economic policies from the new thinking It was originally published as a special issue of the International Review of Applied Economics

Taxes and Exchange Rates in the EU J. Lórié, 2006-09-22 This book looks at concerns in the EU about differences in company tax rates exchange rate changes and inflation differentials building an analytical model which includes the finance decision of firms particularly those decisions which have a strong tax component

Economic Aspects of Digital Information Technologies Thomas Gries, Leena Suhl, 2012-12-06 The rapid development of information and communication technologies has been one of the major issues in the world economy of the last decade Especially the fast growth of the Internet has introduced completely new economic and related issues like world wide Electronic Commerce and its taxing telework activities distance learning and so on It has become possible to split organizations into small units which may form an electronically connected network taking new shapes in a flexible way Since the growth of the Internet has been fast and fairly uncontrolled a strong need for new laws sometimes called Cyberlaw has emerged On the other hand the individual skills of information technologies may be of critical importance to the success of a person in his or her professional career This book discusses several new aspects and economic impacts of digital information technologies A primer on Internet economics provides an introduction to the structure of the Internet and its economic issues Further related subjects are taxing of the world wide Electronic Commerce Cyberlaw learning with hypermedia and distance learning over the network We also discuss the general impact of information technologies on innovation dynamics labor demand and human capital depreciation Results of a recent survey on European telework activities give insight into rapid organizational changes due to the digitalization of economies General information technology related aspects like the need of a rapid transfer of new economic knowledge and semantic integration of online information are provided

Central Bank Strategy, Credibility, and Independence Alex Cukierman, 1992 This book brings together a large body of Cukierman's research and integrates it with recent developments in the political economy of monetary policy

Taxing Portfolio Income in Global Financial Markets Doron Herman, 2002

International Finance and Financial Crises Mr. Peter Isard, Mr. Andrew K. Rose, Assaf Razin, 2000-01-24 This book contains the proceedings of a conference held in honor of Robert P Flood Jr Contributors to the conference were invited to address many of the topics that Robert Flood has explored including regime switching speculative attacks bubbles stock market volatility macro models with nominal rigidities dual exchange rates target zones and rules versus discretion in monetary policy The results contained in this volume include five papers on topics in international finance

The Illicit Global Economy and State Power H Richard Friman, Peter Andreas, 1999-02-18 Illicit cross border flows such as the smuggling of drugs are proliferating on a global scale This volume explores the selective nature of the state's

retreat persistence and reassertion in relation to the illicit global economy **Trade and Tax Policy, Inflation and Exchange Rates** Assaf Razin, Hans-Jürgen Vosgerau, 2012-12-06 Ass a f R a z i n and Hans Jiirgen Vosgerau The eight chapters of this volume have been grouped into two parts Part A of contains chapters which are mainly monetary in character whereas real aspects international economics are treated in Part B It goes without saying that this is only a device for structuring the field In substance most chapters reveal the close connections between real and monetary aspects Part A on Inflation Exchange Rates and Macro Economic Adjustment in the Global Economy consists of four papers In recent years an inflation targeting framework for monetary policy has been adopted by New Zealand Canada the United Kingdom Finland Sweden Australia and Spain in chronological order The use of inflation targeting can be viewed as a further step in the evolution of monetary policy techniques adopted by central banks A common feature of the countries that have adopted inflation targets is the relatively poor inflation record over the last 30 years compared with other industrial countries such as Germany Switzerland Japan and the United States Because of their relatively good inflation record this latter group of countries has not explicitly adopted inflation targeting With or without explicit inflation targeting the monetary policy credibility hinges on the independence of the central bank Alex Cukierman addresses the issue of central bank independence by surveying alternative ways to characterize independence

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Table of Contents International Taxation In An Integrated World

1. Understanding the eBook International Taxation In An Integrated World
 - The Rise of Digital Reading International Taxation In An Integrated World
 - Advantages of eBooks Over Traditional Books
2. Identifying International Taxation In An Integrated World
 - Exploring Different Genres
 - Considering Fiction vs. Non-Fiction
 - Determining Your Reading Goals
3. Choosing the Right eBook Platform
 - Popular eBook Platforms
 - Features to Look for in an International Taxation In An Integrated World
 - User-Friendly Interface
4. Exploring eBook Recommendations from International Taxation In An Integrated World
 - Personalized Recommendations
 - International Taxation In An Integrated World User Reviews and Ratings
 - International Taxation In An Integrated World and Bestseller Lists
5. Accessing International Taxation In An Integrated World Free and Paid eBooks
 - International Taxation In An Integrated World Public Domain eBooks
 - International Taxation In An Integrated World eBook Subscription Services
 - International Taxation In An Integrated World Budget-Friendly Options

6. Navigating International Taxation In An Integrated World eBook Formats
 - ePub, PDF, MOBI, and More
 - International Taxation In An Integrated World Compatibility with Devices
 - International Taxation In An Integrated World Enhanced eBook Features
7. Enhancing Your Reading Experience
 - Adjustable Fonts and Text Sizes of International Taxation In An Integrated World
 - Highlighting and Note-Taking International Taxation In An Integrated World
 - Interactive Elements International Taxation In An Integrated World
8. Staying Engaged with International Taxation In An Integrated World
 - Joining Online Reading Communities
 - Participating in Virtual Book Clubs
 - Following Authors and Publishers International Taxation In An Integrated World
9. Balancing eBooks and Physical Books International Taxation In An Integrated World
 - Benefits of a Digital Library
 - Creating a Diverse Reading Collection International Taxation In An Integrated World
10. Overcoming Reading Challenges
 - Dealing with Digital Eye Strain
 - Minimizing Distractions
 - Managing Screen Time
11. Cultivating a Reading Routine International Taxation In An Integrated World
 - Setting Reading Goals International Taxation In An Integrated World
 - Carving Out Dedicated Reading Time
12. Sourcing Reliable Information of International Taxation In An Integrated World
 - Fact-Checking eBook Content of International Taxation In An Integrated World
 - Distinguishing Credible Sources
13. Promoting Lifelong Learning
 - Utilizing eBooks for Skill Development
 - Exploring Educational eBooks
14. Embracing eBook Trends
 - Integration of Multimedia Elements

- Interactive and Gamified eBooks

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