



The Principles of International **Tax Planning**



International Tax Planning

Andrew Lymer, John Hasseldine



International Tax Planning:

Tolley's International Tax Planning Malcolm J. Finney, 1991 International Tax Planning Brendon Barretta, 2021-08-11

International taxation is the study or determination of tax on a person or business subject to the tax laws of different countries or the international aspects of an individual country's tax laws as the case may be. Written for the CPA or attorney, the advanced studies cover new theories of international tax planning that fit the changes in E-commerce. Learn about the Google treaty shopping tax plan and the tax savings by placing your website on an offshore computer. This book's international tax strategies will provide your clients with legitimate international tax plans. Using new concepts of trust and company law, you learn advanced cross-border tax planning for E-commerce businesses, importers, and the multi-national family.

International Tax Planning and Prevention of Abuse Luc De Broe, 2008. This study considers how tax authorities attempt to strike down international tax avoidance structures, in particular those involving the use of conduit and base companies set up by third-country residents for purposes of treaty shopping and EC Directive shopping. The book focuses on the interaction between provisions and judicially developed doctrines of domestic tax law preventing international tax avoidance on the one hand and norms of international law, in particular tax treaties and rules of Community law, on the other. It also considers treaty-based anti-avoidance measures such as the beneficial ownership requirement and limitation on benefits provisions. This part of the study compares and analyses the case law of Australia, Austria, Belgium, Canada, the Czech Republic, Finland, France, Germany, India, the Netherlands, Switzerland, the United Kingdom, and the United States.

Ireland in International Tax Planning Charles Haccius, 2004. Revised and updated edition providing the introduction to Irish tax legislation along with an explanation of the effect of treaty relief. The discussion of treaties includes practical comparison with the OECD Model Convention and the effect on treaty relief of the Constitution of Ireland. Follows practical discussion of Ireland's tax breaks, beginning with a discussion of the circumstances in which a company resident or carrying on business in Ireland qualifies for the 12.5% rate of corporation tax and continuing with the issues of the tax-efficient establishment and financing of a trading presence in Ireland, whether through a subsidiary or a permanent establishment or both. Possible tax planning opportunities are then discussed, both long-standing tax breaks such as relief for artists and inventors, forestry, bloodstock, and foreign domiciliaries, and opportunities such as those arising from the exercise of an employment in Ireland and the employment of crew members employed on ships or aircraft by an Irish resident company. The book also discusses transfer pricing and anti-avoidance provisions both in the Irish domestic tax legislation and in tax treaties.

The Principles Of International Tax Planning Roy Saunders, Miles Dean, Richard Williams, Diana Van Der Merwe, 2008-09-01. The book is based around a case study of a fictitious Italian family with an abundance of personal and corporate tax issues. The work is presented in ten chapters, each covering a specific principle of international tax planning, such as: Is the advice lawful and why are trusts useful in tax planning? Each chapter is split into two distinct sections. The first section analyses the law

applicable to the principle in question and the second puts this into context by reference to the case study Accountants bankers lawyers students tax advisers and managers of trust companies will benefit from studying The Principles of International Tax Planning either in depth or as a useful reference book Because the book has been written by a firm specializing in International taxation it considers the same questions and issues from the perspective of a number of different jurisdictions such as France Italy South Africa Switzerland the UK and the US Whether you are just interested in international tax or whether international tax is your livelihood your horizons will be broadened by reading this book and you will have fun while doing so

Belgium in International Tax Planning Patrick A. A. Vanhaute, 2008 This book focuses on commercial and company law and corporate income tax It provides a systematic and comprehensive overview of the current tax planning opportunities that exist in Belgium After some essential legal knowledge of Belgium the chapters consider the Belgian tax regime special features of the Belgian tax system specific anti avoidance provisions and international tax planning tax incentives special tax regimes and tax planning opportunities including the tax treaties with Hong Kong the USA and the UAE

International Taxation Adnan Islam, 2020-08-17 Whether your organization is contemplating a global move or is already involved in international business you need to know about the activities that create multi jurisdictional tax exposure and the required tax reporting for each relevant jurisdiction Information is provided for Tax Reform and the impact of the Tax Cuts and Jobs Act of 2017 this guide covers international tax terminology and regulations that apply to a U S entity involved in global operations or for a foreign entity doing business in the United States Key topics include Export income Receipts in foreign currency Allocation and apportionment of deductions U S foreign tax credit fundamentals and special rules Initiation of foreign operations Foreign branches and affiliated companies Sale of use of tangible property Foreign business operations in the United States Foreign business sales of tangible property in the United States Foreign business provision of services in the United States Exploitation of business assets outside of the United States Use of foreign tangible intangible property in the United States U S withholding taxes on foreign businesses FDII GILTI

International Tax Planning William C. Gifford, William P. Streng, 1979

International Company Taxation Ulrich Schreiber, 2013-01-30 The book is written for students of business economics and tax law It focuses on investment and financing decisions in cross border situations In particular the book deals with Legal structures of international company taxation International double taxation Source based and residence based income taxation International investment and profit shifting International corporate tax planning International tax planning and European law Harmonization of corporate taxation in the European Union International tax planning and tax accounting International tax law is designed to avoid international double taxation and to combat international tax avoidance Nevertheless companies investing in foreign countries may suffer from international double taxation of profits On the other hand these companies may also be able to exploit an international tax rate differential by means of cross border tax planning Ulrich Schreiber holds the chair of Business Administration and Business Taxation at the

University of Mannheim He serves as co editor of Schmalenbachs Zeitschrift f r betriebswirtschaftliche Forschung zbf and Schmalenbach Business Review sbr and is affiliated with the Centre for European Economic Research ZEW as a research associate Ulrich Schreiber is a member of the Academic Advisory Board of the Federal Ministry of Finance

Practical International Tax Planning Marshall J. Langer,1979 The International Taxation System Andrew Lymer,John Hasseldine,2012-12-06 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

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 *International Company Taxation in the Era of Information and Communication Technologies* Anne Schäfer,2007-12-18 The increased use of information and communication technologies ICT is leading to noticeable changes within the organisational structure of the economy Geographical distances within companies as well as between companies and their customers can be bridged more easily with the use of ICT Thus economic activities are less dependent on time and place Taking into account the manifold changes in the economic structures it has to be questioned whether and to what extent the current rules of international company taxation are still applicable in a reasonable way With regard to this issue a need for the development of suitable reform approaches covering the whole system of international taxation still existed The doctoral thesis of Mrs Schafer provides a major contribution to fulfill this need Mrs Schafer has worked out in a very comprehensive way the creation of new organizational structures as well as the resulting implications on tax law and the system of international taxation Moreover the existing literature on the subject at hand has been analyzed in a competent way The special merit of the doctoral thesis of Mrs Schafer consists in elaborating reform proposals for international company taxation which cover the different relevant issues of international

taxation **International Taxation in America** Brian Dooley, 2011-02-01 International Taxation in America presents the most complete and indispensable guide to international taxation available in today's market. Author Brian Dooley CPA is a seasoned tax researcher and specialist in international tax and is among the very few experts who have experienced hundreds of international tax audits without a loss. Covering international taxation for businesses, the taxation of shareholders of foreign corporations, foreign tax credits, cross-border estate planning, and much more, Dooley offers meticulous research and clear explanations of hundreds of international tax-related issues. Whether the subject is tax haven corporations and trusts, reducing taxes through tax treaties, learning how Americans are taxed abroad, or estate planning for multinational families, Dooley explains the subject in thorough and clear language. International Taxation in America provides valuable lessons for your enrichment, including useful links to help guide you online. You'll receive the level of information and expertise required to avoid mistakes and IRS scrutiny.

Fixing U.S. International Taxation Daniel N. Shaviro, 2014-04 Fixing U.S. International Taxation provides a major rethinking of the tax issues raised by cross-border investment and the activities of multinational corporations.

Advance Tax Planning Yun Vall, 2021-08-13 International taxation is the study or determination of tax on a person or business subject to the tax laws of different countries or the international aspects of an individual country's tax laws as the case may be. Written for the CPA or attorney, the advanced studies cover new theories of international tax planning that fit the changes in E-commerce. Learn about the Google treaty shopping tax plan and the tax savings by placing your website on an offshore computer. This book's international tax strategies will provide your clients with legitimate international tax plans. Using new concepts of trust and company law, you learn advanced cross-border tax planning for E-commerce businesses, importers, and the multinational family.

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 U.S. International Tax Planning and Policy Samuel C. Thompson,2007 To access the 2010 Supplemental Materials click here This book addresses the provisions of the Internal Revenue Code that govern the U S operations of foreign persons i e inbound transactions and the foreign operations of U S persons i e outbound transactions Part I provides a general introduction and introduces the impact of tax treaties Part II focuses on the taxation of inbound transactions and addresses such issues as the U S taxation of a branch or U S subsidiary owned by a foreign corporation Part III considers outbound transactions and deals with the U S taxation of foreign corporations controlled by U S persons This part also addresses the rules regarding transfer pricing between commonly controlled entities such as a U S parent corporation and its foreign subsidiary Part IV focuses on cross border mergers and acquisitions Particular attention is given to the role of Section 367 on cross border reorganizations The last sections of most chapters briefly discuss the manner in which South Africa which has recently reformed its international tax system addresses the issues presented in the chapter From a tax planning standpoint the U S tax advisor should have a basic understanding of the interface between the U S and foreign tax system involved in the transaction and these discussions illustrate the interface between two sophisticated systems the U S and South Africa *Langer on Practical International Tax Planning: Focus on tax planning* Denis A. Kleinfeld,Marshall J. Langer,Edward J. Smith,2000 Examining more than 50 tax advantaged territories around the world PLI's Langer on Practical International Tax Planning gives you the current knowledge and savvy advice you need to help clients capitalize on ripe tax havens and financial centers Basic International Taxation Roy Rohatgi,2005-01-01 Provides a comprehensive overview of the basic principles of international taxation and considers these in the context of practical planning guidance This book presents an analysis of the practical application of these principles supported by a review of international tax practices by leading professionals in over sixty jurisdictions worldwide

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