

Principles of International Taxation



Ninth Edition

Lynne Oats

Principles Of International Taxation

Lynne Oats



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Principles of International Taxation Lynne Oats, Angharad Miller, Emer Mulligan, 2017-09-28 This highly accessible text provides a clear introduction to international taxation as well as more in depth material on many essential areas of the subject Whilst using some examples from the UK tax system it presents its material in a global context explaining the variety of approaches used around the world to deal with the key issues that arise in international tax *Principles of International Taxation* Lynne Oats, 2023-11-02 This title 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 As well as practitioners who are less familiar with international taxation principles this title is also used as a core text by many undergraduate and post graduate students studying business degrees It is also widely used by those studying for the CIOT Advanced Diploma in International Taxation Business is increasingly carried on a global scale and as such an understanding of how international taxation works is very useful for in house finance teams as well as their advisers The 9th edition is again fully updated to cover important regulatory and legislative developments including those in light of the ongoing OECD BEPS project implementation Other key developments include Progress towards a global minimum corporate tax rate to curb base erosion and tax competition Pillar 2 eg OECD implementation framework and UK draft legislation New crypto asset reporting framework released by OECD Ongoing impact of Covid 19 on international taxation Progress in relation to tackling tax evasion now that country by country reporting is bedding in Further developments in European direct taxation including the debt equity bias reduction allowance DEBRA and new Directive to prevent the misuse of shell entities The updating is done by Lynne Oats Professor of Taxation and Accounting University of Exeter Business School and formerly Deputy Director of the Tax Administration Research She has managed this project since its inception

Basic International Taxation: Principles of international taxation Roy Rohatgi, 2005 This book provides a comprehensive overview of the basic principles of international taxation and considers these in the context of practical planning guidance Volume 1 Principles gives an overview of international taxation principles of international tax law model tax conventions on double tax avoidance and the impact of domestic tax systems Volume 2 Practice deals with the practice of international taxation including international tax planning techniques basic issues in anti avoidance and gives an overview of the international offshore financial centres Principles of International Taxation Lynne Oats, Emer Mulligan, 2019

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International Tax Policy and Double Tax Treaties Kevin Holmes, 2007 Explains the concepts that underlie international tax law and double tax treaties and provides an insight into how international tax policy law and practice

operate to ultimately impose tax on international business and investment *The Principles of International Tax* Adrian Ogley, 1993 This work on international tax aims to strip away the mystique that can surround the subject International tax is now recognised as an important discipline in its own right The book sets out to synthesise its most important elements

Basic International Taxation Roy Rohatgi, 2005

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 Tax Primer** Brian J. Arnold, 2023-03-09 Tax practitioners multinational companies and national tax authorities have relied on this indispensable resource since its first edition over 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 fifth edition follows the format and sequence of earlier editions with updates on ongoing developments with respect to the Organisation for Economic Co operation and Development s OECD base erosion and profit shifting project the revisions to the OECD Guidelines on Transfer Pricing and updates to the OECD and UN Model Conventions Several new sections have been added to the fifth edition Unquestionably the most important development in international tax since the publication of the fourth edition in 2018 has been the OECD Inclusive Framework s Pillar One and Pillar Two proposals for dealing with the tax challenges posed by the digital economy This edition explores in detail both Pillar One which proposes new nexus and profit allocation rules for the residual profits of the largest and most profitable digital multinationals and Pillar Two which proposes a global minimum tax on large multinationals Also new to the fifth edition are sections dealing with digital services taxes hybrid arrangements and new Article 12B of the UN Model Convention dealing with automated digital services as well as a brief history of international tax 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 taxation of residents on foreign income and 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

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

Basic International Taxation: Principles Roy Rohatgi, 2005

[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

Basic Concepts of International Taxation Jacob A. Frenkel, Assaf Razin, Efraim Sadka, 1990 Free movements of goods and capital across national borders have important implications for both direct and indirect taxation The paper discusses the following issues a The implications of different treatments of resident capital income originating abroad and nonresident capital income originating at home b The implications of different treatments of exports and imports under the indirect tax system VAT c What is the economically efficient international tax structure

The Principles of International Tax Planning Roy Saunders, 2005 This book aims to demonstrate the intricacies of international tax planning It is based around a case study of a fictitious Italian family with an abundance of personal and corporate tax issues Each chapter analyses the laws applicable to the principle in question then puts this firmly into context by reference to the case study

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

INTERNATIONAL TAXATION Mr. Narayanaswamy T C ,Mr. Gowtham M. P ,2026-03-02 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 **Introduction to United States International Taxation** James R. Repetti,Diane M. Ring,,Stephen Shay,2021-07-07 The new edition of this well known reference work for the tax community provides an introduction to the application of the United States US international taxation system to taxpayers investing or transacting business in the US and other countries In a relatively brief and manageable form it sets forth the principles adopted by the US in taxing US or foreign individuals and corporations as they invest work or carry on a trade or business in the US or abroad The presentation focuses on the following aspects of the subject matter general aspects of the corporation income tax the individual income tax the tax treatment of partnerships trusts and accounting aspects the basic jurisdictional principles adopted by the US with respect to application of its income tax to international investment and business transactions the US rules for taxing foreign corporations foreign partnerships foreign trusts and nonresident aliens on their business and investment income derived

from US sources the basic mechanism adopted by the US to alleviate international double taxation on foreign source income derived by US persons the income tax treatment of foreign corporations controlled by US shareholders including the new GILTI minimum tax and exempt dividend rules the special treatment under FDII of a US corporation's export of goods services and intangible rights the general intercompany pricing rules and special transfer pricing rules applicable to particular transactions rules for the treatment of transactions involving currencies other than the US dollar situations in which US income tax treaty provisions modify the basic rules and the wealth transfer tax system including modifications made by estate and gift tax treaties Throughout the discussion the authors incorporate references not only to the Internal Revenue Code provisions under discussion but also to relevant Treasury Regulations and other administrative material and to important cases that have arisen For non US tax practitioners tax professors and students both within and outside the US and others seeking a structural framework within which a US tax problem can be placed Introduction to United States International Taxation offers the ideal reference source

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