



Fundamentals of International Tax Planning

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Reuven S. Avi-Yonah



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Fundamentals of International Tax Planning Raffaele Russo, 2007 Economic activities have never been as global as they are today. This has contributed to the increase in the mobility of economic activities around the globe and has created opportunities as well as problems for the players in the world economy. Looking at this setting from a tax perspective, **Fundamentals of International Tax Planning** provides readers with a basic knowledge of the tools currently used by multinational enterprises to benefit from the opportunities and overcome the problems created by the expansion of the market. In other words, this book looks at techniques used to reduce an MNE's tax burden. **Fundamentals of**

International Taxation Jon E. Bischel, Robert Feinschreiber, 1977 Discussion of the United States tax laws that effect international business including international trade investment and finance as of Tax Reform Act of 1976. **Advanced**

Introduction to International Tax Law Reuven S. Avi-Yonah, 2015-02-27 **Advanced Introduction to International Tax Law** provides a concise yet wide ranging overview of the key issues surrounding taxation and international law from a world authority on international tax. Systems of taxation deviate between jurisdictions. International Law of Taxation Peter Hongler, 2021 **Elements of International Law** represents a fresh approach in the literature of international law. It is a long series of short books. **Elements** adopts an objective non argumentative approach focusing on narrowly defined core topics in international law. Eventually the series will offer a comprehensive treatment of the whole of the field. At the same time each individual title will be a reliable go to source for practising international lawyers, judges and arbitrators, government and military of officers, scholars, teachers and students. Book jacket 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 für 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. **Quantitative internationale Konzernsteuerplanung** Andreas Lühn, 2009-03-25

Andreas Lühn analysiert die Ziele, Gestaltungsinstrumente und die steuerrechtlichen Grundlagen der internationalen

Konzernsteuerplanung Er entwickelt ein Simulationsmodell mit dem die steuerlichen Wirkungen verschiedener Entscheidungen in Konzernen insbesondere Finanzierungsformen Holdingstrukturen Verrechnungspreise berechnet werden können

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

Steuerplanung bei internationaler Forschung und Entwicklung Karl Broemel, 2015-10-14 Der Autor analysiert qualitativ und quantitativ die steuerlichen Rahmenbedingungen für die Forschungs und Entwicklungstätigkeit international agierender Konzerne und geht dabei der Frage nach inwieweit Unternehmen Steuerplanung durch die gezielte Ausgestaltung von F E betreiben können Die Untersuchung legt die gegenwärtigen steuerlichen Chancen und Risiken grenzüberschreitender Auftragsforschung offen und plausibilisiert die Auswirkungen möglicher Entwicklungen des Internationalen Steuerrechts

Der Einfluss der EuGH-Rechtsprechung auf die deutsche Unternehmensbesteuerung Gregor J. Führich, 2009-07-27 Gregor J Führich zeigt in wichtigen Gebieten der internationalen Steuerplanung Steueraufschub Zinsabzug Verlustverrechnung und stille Reserven grundlegende Gestaltungsideen aus der Sicht eines deutschen Konzerns auf Für diese Bereiche der Steuerplanung analysiert er die EuGH Rechtsprechung und diskutiert inwiefern diese Rechtsprechung dazu beiträgt internationale Steuerplanung zu erleichtern oder zu begrenzen

Fundamentals of Transfer Pricing Raffaele Petruzzi, Giammarco Cottani, Michael Lang, 2022-06-20 This is Part Two of a crucially significant two volume set on the nature of transfer pricing that fully elucidates how the growing body of applicable rules works in practice The preceding volume subtitled General Topics and Specific Transactions focused on basic principles and specialized topics This volume enlarges the scope of the first volume particularly concerning industry specifics regional considerations the use of new technologies and the intersection between transfer pricing rules and other disciplines As in the first volume stakeholding contributors from government multinational companies international organizations advisory groups and academia offer deeply informed perspectives both general and specific on the practical application of transfer pricing rules With numerous examples and relevant international judicial precedents the authors augment the first volume in such ways as the following extended analysis of particular business sectors including automotive banking consumer goods insurance IT oil and gas and pharmaceuticals specific jurisdictional coverage of the United States the European Union Brazil China and India detailed presentation of the use of new technologies by both taxpayers and tax authorities and further in depth analysis of transfer pricing's interaction with various

fields of law With this authoritative source of practical guidance advisors in house practitioners government officials and academics worldwide will have all the details they need to move forward in tackling the complex aspects of the current transfer pricing environment Neuausrichtung der deutschen Hinzurechnungsbesteuerung Benjamin Cortez,2013

Hybrid Entities in Tax Treaty Law Sriram Govind,Jean-Philippe Van West,2020-09-03 Tax treaty law and EU tax law in connection with hybrid entities Hybrid entities have traditionally been used as an avenue for international tax planning and extending benefits under tax treaties to such entities has been a source of controversy for many years now Although the OECD Partnership Report provided solid policy footing on this issue there was still no common legal basis that countries could rely on for such positions The increasing focus of countries towards the curbing of tax avoidance and abuse involving hybrid mismatch arrangements culminated in a specific action plan in the BEPS Project being dedicated to the design of domestic rules and the development of treaty provisions that would neutralize the tax effects of such arrangements This volume provides an in depth analysis of various aspects of this topic It is divided into two parts the first dealing exclusively with tax treaty issues arising in connection with hybrid entities and the second dealing with EU tax law issues surrounding hybrid entities The former part comprises chapters analysing how tax treaties have historically dealt with this issue with a focus on domestic court jurisprudence the positions in the OECD and the UN Model Conventions the developments that have come about owing to the BEPS Project and the impact of several existing measures regimes and vehicles on these tax treaty provisions The latter part comprises chapters on how hybrid entities are dealt with under primary EU law under various secondary law directives including the newly enacted Anti Tax Avoidance Directives and an analysis of policy solutions offered in this direction **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 B a ej Ku niacki 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 *Concept and Implementation of CFC Legislation* Nathalie Bravo,Alexandra Miladinovic,2021-09-21 An in depth analysis of various aspects of CFC legislation This volume provides an in depth analysis of various aspects of the topic Concept and Implementation of CFC legislation The volume is divided into four parts The first part comprises chapters discussing the historical background policy considerations and different CFC approaches that have been implemented in domestic legislation While the chapters included in the second part focus on the recommendation for the effective design of CFC rules found in BEPS Action 3 the chapters encompassed in the third part analyse the implementation of these criteria in Articles 7 and 8 of the ATAD and the compatibility of these provisions with EU primary law Finally the chapters encompassed in part four deal with selected issues related to CFC rules including the compatibility of CFC legislation and tax treaties the relationship between these rules and general anti abuse rules the

implications of the proposed CCCTB Directive on CFC rules alternative approaches to CFC legislation such as the Global Anti Base Erosion proposal of the OECD G20 the interrelationship between CFC rules and transfer pricing legislation and the balance between effective CFC rules and compliance burdens **Practical International Tax Planning** Marshall J. Langer,1979 *Cash-Flow-Unternehmenssteuern und Europäisches Recht* Peter Christian Müller,2013-12-24 Die Globalisierung und die Struktur multinational t tiger Unternehmen stellen die Staaten vor die gro e Herausforderung die auf ihrem Staatsgebiet ausgef hrten wirtschaftlichen T tigkeiten wirksam der Besteuerung zuzuf hren Diesem Wettbewerb stellen sich die Staaten bisher durch eine Absenkung von Gewinnsteuern und die Versch rfung von Anti Missbrauchsregelungen Eine Alternative zu der bisherigen internationalen Erfolgsallokation stellt eine Orientierung am Bestimmungsland und damit dem Sitzstaat des Endkonsumenten dar Vor diesem Hintergrund stellt die vorliegende Arbeit zun chst die grundlegenden Methoden der Eink nfteermittlung sowie der Bestimmung des Besteuerungsortes dar Der Schwerpunkt liegt hierbei auf zwei Varianten einer bestimmungslandbasierten Cash Flow Unternehmenssteuer In der ersten Variante wird der Zahlungsmittel berschuss auf Basis einer Aufteilungsformel alloziert in der zweiten in Form eines Grenzausgleichs in Anlehnung an die europ ische Mehrwertsteuer Im Anschluss daran wird ausf hrlich der Rechtsrahmen des Europarechts und des Rechts der Doppelbesteuerungsabkommen aufgezeigt in dem sich ein Mitgliedstaat der Europ ischen Union bei der Ausgestaltung seines Steuersystems befindet Dieser Rechtsrahmen findet im Folgenden Anwendung im Zuge einer detaillierten Analyse ob einer dieser beiden Vorsch l ge einer Cash Flow Unternehmenssteuer auf Basis des Bestimmungslandprinzips umgesetzt werden kann In Anlehnung an diese Analyse werden Ans tze f r eine rechtskonforme Umsetzung skizziert *Luxembourg in International Tax Planning* Philip J. Warner,2004 Study divided into five parts a short introduction to Luxembourg as a country and financial centre calculation of profits taxes and other taxes to which a fully taxable resident business is subject the fully taxable special purposes vehicles available in Luxembourg including banking and reinsurance tax exempt vehicles the 1929 holding company and investment funds and corporate reorganizations and examples of how Luxembourg could be used in international tax planning **The European Union and Direct Taxation** Luca Cerioni,2015-06-05 Within the European Union direct taxation is an area which often provokes controversy due to tensions between the tax sovereignty of the individual Member States and the desire for an integrated internal market This book offers a critical review of the legislative and case law developments in this area at the EU level and reviews the European Commission s proposed solutions in light of their concerns regarding the proper functioning of the EU s internal market Luca Cerioni set out a series of benchmarks determined from the objectives expressed by the European Commission including the elimination of double taxation and double non taxation the simplification of cross border tax compliance the reduction of abusive forum shopping practices and general aggressive tax planning strategies legal certainty for all businesses and individuals carrying on activities and receiving income in more than one EU Member State Cerioni uses these

benchmarks to ask which Directives and or rulings have left legal uncertainty and which have ended up creating or increasing the scope for aggressive tax planning The book puts forward a comprehensive solution for a new optimal regime relating to tax residence which would contribute to the EU project to the mutual benefit of Member States and taxpayers As a thorough and critical discussion of EU tax rules in force and of the European Court s case law in direct taxation this book will be of great use to academic researchers and students of EU law tax practitioners and policy makers at the EU and national level

Tax Planning Basics Emily Johnson, AI, 2025-02-22 Tax Planning Basics offers a comprehensive introduction to the core principles of tax planning and tax compliance essential for both individuals and businesses It emphasizes understanding tax efficiency to minimize tax liabilities and maximize financial well being The book approaches the subject in plain language making complex concepts accessible to a general audience interested in finance The book begins with the fundamentals of income and expense accounting then progresses to strategic aspects like deductions tax credits and investment strategies A key insight is that proactive tax planning is vital for long term financial success For example understanding the difference between tax deductions and tax credits can significantly impact your overall tax bill The book s structure guides readers from basic principles to developing personalized investment strategies incorporating checklists and real world scenarios What makes Tax Planning Basics particularly valuable is its focus on clarity avoiding jargon and providing actionable advice to navigate the complexities of the tax system effectively

International Tax Planning Today Robert Feinschreiber, 1977

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