

International Tax Primer

FIFTH EDITION

BRIAN J. ARNOLD



Wolters Kluwer

Free International Tax Primer

Florian Haase, Georg Kofler



Free International Tax Primer:

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

International Tax Primer Brian Arnold, 1995-10-30 As countries worldwide have become more economically integrated The importance of international taxes has grown significantly especially in countries formerly part of the Soviet Union or the Soviet bloc The authors of this book worked with the OECD in conducting seminars on international tax for tax officials in these countries In International Tax Primer they address international aspects of income taxation in particular countries

emphasising tax treaties and other cooperative arrangements which help coordinate countries income tax systems with the tax systems of their trading partners International Tax Primer 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 role of the tax adviser tax planning techniques international double taxation anti avoidance rules and an overview and analysis of tax treaties The work also offers such practical features as An extensive glossary of international tax terms and a selected bibliography of international tax reference materials including a list of periodicals devoted to international tax Students government officials and tax practitioners who may be confronting international tax issues For The first time As well as experienced international tax practitioners will find International Tax Primer a helpful articulation of the fundamental principles that arise again and again in this field it works as both an introduction and a refresher in an area where issues often prove more complex than they seem and where a return To The basics is often the most helpful means of untangling a multi layered problem The Oxford Handbook of International Tax Law Florian Haase,Georg Kofler,2023-10-13 International Tax Law is at a turning point Increased tax transparency the tackling of Base Erosion and Profit Shifting BEPS the reconstruction of the network of bilateral tax treaties the renewed discussion about a fair and efficient allocation of taxing rights between States in a global digitalized economy and the bold push for minimum corporate taxation are some expressions of this shift This new era also demonstrates the increased influence of international standard setters such as the OECD the UN and the EU Each of these developments alone has the potential of being disruptive to the traditional world of international tax law but together they have the potential to reshape the international tax system The Oxford Handbook of International Tax Law provides a comprehensive exploration of these key issues which will shape the future of tax law Divided into eight parts this handbook traces the history of international tax law from its earliest days until the present including reflections on the developments that have characterized the last one hundred years The second section places tax law within the broader international context considering how it relates to public and private international law as well as corporate trade and criminal law Sections three and four consider key legal principles and issues such as regional tax treaty models OECD dispute resolution and transfer pricing versus formulary apportionment Subsequent analysis places these issues within their European and cross border contexts providing an assessment of the role of the ECJ state aid and cross border VAT Section seven broadens the scope of this analysis asking how trends in recent major economies and regions have helped shape the current outlook The final section considers emerging issues and the future of international tax law With over sixty authors from 28 different countries the Oxford Handbook of International Tax Law is an invaluable resource for scholars academics and practitioners alike **Law and Policy of the African Continental Free Trade Area (AfCFTA)** Tapiwa Victor Warikandwa,Howard Chitimira,Patrick C. Osode,2025-12-25 The Africa We Want has developed as a critical long term development strategy for the African continent

and has never been more relevant than in this book which provides a thorough examination of the African Continental Free Trade Area's role in expanding intra African commerce and strengthening Africa's trade position in the world market. Gathering chapters written by experts on commercial law, economic law, international trade law and related fields, it seeks to answer the following question: what are the issues that influence the African Continental Free Trade Area's potential and challenges? The book provides an in-depth analysis of various contemporary aspects within the African Continental Free Trade Area (AfCFTA) as well as country-specific case studies and comparative analyses of selected developments that inform the AfCFTA. As the authors show, the AfCFTA faces substantial and numerous challenges that include the existence of different regulatory environments in different countries, political instability, technical and technological shortcomings, businesses' inability to obtain credit from banks, among other issues. This book will appeal to trade lawyers, economists, financial and prudential regulation analysts, researchers, policy and development analysts, government officials, among others. The book highlights the undeniable need for adequate continental legislative and policy frameworks to facilitate intra-Africa trade, foreign direct investment and ease of doing business on the continent.

EU Freedoms, Non-EU Countries and Company Taxation D.S. Smit, 2012-06-01. In today's environment of largely globalizing national economies, international economic integration does not stop at the frontiers of the European Union. Many non-EU based enterprises are carrying on business in the European Union through the operation of branches or subsidiaries established in EU Member States, and a large number of EU based enterprises maintain a diversified range of investments outside the Union. Accordingly, in both inward and outward investment relationships, economic openness is key nowadays. This legal relationship between EU Member States and the EU as a whole vis-à-vis the rest of the world is the starting point of this book. The author analyses the freedom of investment concept between EU Member States and non-EU States under EU law and specifically its effect on company taxation regimes from the perspective of multinational enterprises. Focusing on the impact of the Treaty freedoms and international integration agreements on relations with non-EU Member States, this work is the first to specifically address the all-important issue: Under which circumstances can investment-related rights deriving from EU law be invoked by companies established in non-EU states? The analysis identifies the impact of the EU Treaty freedoms on six basic corporate income tax themes that are of particular interest for multinational enterprises: limitation on the deduction of interest expenses, withholding taxes on dividend interest and royalty payments, relief for double taxation of income received from foreign investments, CFC legislation, non-deduction of foreign losses from the domestic taxable base and company taxation upon the transnational transfer of business assets.

The Interface of International Trade Law and Taxation Jennifer E. Farrell, 2013. This book explores the ill-defined and oft-underestimated relationship between the World Trade Organization (WTO) and taxation. By adopting a two-pronged approach, the relationship is examined in terms of the extent to which the WTO legal framework exerts influence upon domestic tax law and international tax policy and whether it is appropriate for the

WTO to play a regulatory role in the field of taxation The book begins with an examination of the historical development of international trade law and international tax law and demonstrates that these two separate areas of law are closely linked in terms of their underlying principles and historical evolution The work then goes on to offer a doctrinal analysis of the tax content found in the WTO legal texts and highlights ambiguities therein *Tax Notes International* ,1996 CCH Guide to Researching Canadian Income Tax Yoko Beriault,Carol Mohammed,2005-08 *How to Conquer the World* Garrett Wasny,1999 Management consultant author and Web master Garrett Wasny provides an annotated listing of over 8 000 international trade resources for businesspeople searching for global customers partners and suppliers on the World Wide Web Organized into ten chapters covering geographic markets and global business functions and covering some 230 countries and territories the volume provides relevant tips on Internet use and appendices offering a variety of resources on identifying useful associates drafting initial correspondence tracking information and troubleshooting Taxation of Foreign Direct Investment:An Introduction Alex Easson,1999-08-24 This book describes the many different ways in which national tax rules and international tax principles affect foreign direct investment decisions and examines their impact on the establishment and operation of foreign invested projects It focuses on tax provisions in both host and home countries and looks at the role of tax treaties the methods of relieving double taxation and of countering tax avoidance **Bulletin for International Taxation** ,2009 The Journal of International Taxation ,1994 *The Political Economy of Corporation Tax* John Snape,2011-12-09 Excellent technical writing on corporation tax abounds but it tends to be inaccessible to public lawyers political theorists and political economists Although recent years have seen not only an explosion in public law scholarship but also a reawakening of interest in interpretative political theory and political economy the potential of these perspectives to illuminate the corporation tax debate has remained unexplored In this important work John Snape seeks to reconcile these disparate strands of scholarship and to contribute to a new way of understanding and conceptualising the reform of the law relating to corporate taxation Drawing on important developments in public law scholarship the study combines elements of political theory and political economy It advances a new interpretation of corporation tax law as an instrument of rule through the maximisation of a nation s economic potential Snape shows how corporate taxation belongs at the centre of any discussion of economic globalisation not only because of the potential of national tax systems to influence inward investment decisions but also because of the potential of those decisions to shape the public interest that those tax systems might embody Following public law and politics models the book looks afresh at the impact of Britain s political institutions of the processes of its representative government and of the theory that moulds and orders the values that the corporation tax code contains This is a timely exploration of cutting edge issues of public policy **Northwestern Journal of International Law & Business** ,2001 **Canadian Tax Journal** ,2003 *World Business Resources.com* Garrett Wasny,2000 Information packed jargon free and easy to use this directory is a one stop guide to finding the most up to date

and practical business information on the Internet **International M&A, Joint Ventures and Beyond** David J. BenDaniel, Arthur H. Rosenbloom, James J. Hanks, 2002-04-22 Financial and legal professionals involved in international mergers and acquisitions need to know about the intricate deals of their business This workbook provides a crash course on all aspects and types of international business deals **The British National Bibliography** Arthur James Wells, 1996
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