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# Bfh Codes September 2014

**Carolin Seibert**



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**GAARs and Judicial Anti-Avoidance in Germany, the UK and the EU** Markus Seiler, 2016-06-28 GAARs the better insight into a country's tax system In a post BEPS tax world and in times of an ever increasing need for tax revenue policy makers are more willing than ever to tighten or adopt General Anti Avoidance Rules GAARs A GAAR is typically a broad principle based rule trying to establish the borderline between abuse and use of a law thereby addressing the phenomenon that as long as there have been taxes persons have been trying to reduce their tax bills This award winning book compares the GAARs and judicial anti avoidance approaches of Germany the UK and the EU It gives a deep insight into the predominant legal traditions of the Western World comprehensively analyses case law and offers unique perspectives on tax law across jurisdictions This book reveals that there is no other feature of tax law that provides a better insight into a country's tax system than its anti avoidance rules GAARs and their historical background reveal so much about judicial perspectives on taxation and legal interpretation citizens tax morale drafters inclinations for technical or principled drafting or legislators willingness to confront politically sensitive issues Understanding the role of GAARs ultimately also reveals whether they are a suitable means to counteract tax avoidance effectively The Book is the winner of the Wolfgang Gassner Wissenschaftspreis 2016

*International Taxation of Manufacturing and Distribution* John Abrahamson, 2016-02-18 The most thorough treatment of its subject available this book introduces and analyses the international tax issues relating to international manufacturing and distribution activities extending from the tax regime in the country where the manufacturing activities are located through to regional purchase and sales companies to the taxation of local country sales companies The analysis includes the domestic tax laws relating to manufacturing and distribution company profits as well as international tax issues relating to income flows and the payment of dividends Among the topics and issues analysed in depth are the following foreign tax credits taxation in the digital economy tax incentives intellectual property group treasury companies mergers and acquisitions leasing derivatives controlled foreign corporation provisions VAT and customs tariffs free trade agreements and customs unions transfer pricing role of tax treaties hedging related accounting issues deferred tax assets and liabilities tax risk management supply chain management depreciation allowances and carry forward tax losses The book includes descriptions of 21 country tax systems and ten detailed case studies applying the analysis to specific examples Detailed up to date attention is paid to the OECD Action Plan on Base Erosion and Profit Shifting BEPS and other measures against tax avoidance As a full scale commentary and analysis of international taxation issues for multinational manufacturing groups including in depth consideration of corporate structures tax treaties transfer pricing and current developments this book is without peer It will prove of inestimable value to all accountants lawyers economists financial managers and government officials working in international trade environments

*Differences between FIN 48 and IFRIC 23* Carolin Seibert, 2022-08-31 Uncertainties about the tax treatment of business transactions in the tax return or tax balance sheet can

cause significant accounting challenges for current and deferred taxes in the financial statements Whereas the accounting treatment of tax risks or tax audit risks has been regulated under US GAAP since 2006 a corresponding IFRS regulation was only published in 2017 and is effective from the 2019 fiscal year The author takes this as an opportunity to analyze and critically assess the differences between the US GAAP accounting regulation FIN 48 Accounting for Uncertainty in Income Taxes and the IFRS accounting regulation IFRIC 23 Uncertainty over Income Tax Treatments Building on the insights from her analysis the author also examines the problem areas arising from IFRIC 23 from the perspective of the German tax authorities German business practice and German advisory practice

*CJEU - Recent Developments in Value Added Tax 2019* Michael Lang, Georg Kofler, Pasquale Pistone, Alexander Rust, Josef Schuch, Karoline Spies, Claus Staringer, Patrice Pillet, 2020-11-05 The most important and recent judgments of the CJEU Considering the ever increasing importance of indirect taxation as a source of revenue for governments the intensifying complexity of the legal framework and the proliferating number of countries adopting indirect taxation it is essential to scrutinize how the law is actually applied in practice The primary driving force in this area is undoubtedly the Court of Justice of the European Union This book analyses selected topics e g fundamental principles and VAT administrative cooperation in VAT taxable base and rates exemptions and deductions by examining the most prominent and recent judgments of the Court of Justice of the European Union Experts from all over the world not just from academia but also government representatives and tax practitioners have provided their input and helped us compile what is an informative and worthy read for anyone dealing with indirect taxation on a professional basis

*Value Based and Intelligent Asset Management* Adolfo Crespo Márquez, Marco Macchi, Ajith Kumar Parlikad, 2019-06-29 The fundamental motivation of this book is to contribute to the future advancement of Asset Management in the context of industrial plants and infrastructures The book aims to foster a future perspective that takes advantage of value based and intelligent asset management in order to make a step forward with respect to the evolution observed nowadays Indeed the current understanding of asset management is primarily supported by well known standards Nonetheless asset management is still a young discipline and the knowledge developed by industry and academia is not set in stone yet Furthermore current trends in new organizational concepts and technologies lead to an evolutionary path in the field Therefore this book aims to discuss this evolutionary path starting first of all from the consolidated theory then moving forward to discuss The strategic understanding of value based asset management in a company An operational definition of value as a concept on the background of value based asset management The identification of intelligent asset management with the aim to frame a set of tools recommended to support the asset related decision making process over the asset lifecycle The emergence of new technologies such as cyber physical systems and digital twins and the implications of this on asset management

Combatting Illicit Trade on the EU Border Celina Nowak, 2020-08-27 This open access book provides the first ever comparative study on criminal policy concerning the illicit trade of tobacco conducted among four

comparatively new EU Member States Lithuania Poland Slovakia and Romania and two old EU countries Germany and Italy The book addresses the national legal frameworks current criminological situation regarding illicit trade of tobacco and the practical challenges faced by national law enforcement authorities in the countries examined It also considers the international framework and concludes with a horizontal report The objective of the book is to highlight legislative and practical challenges in the fight against illegal tobacco products at the national and transnational level and to formulate recommendations for overcoming them more effectively in Europe

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