

2013–2014 EDITION



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**Includes:** Volume I, Volume II,  
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# Canadian Tax Principles 2013 Study Guide

**Joan Hunter**



## **Canadian Tax Principles 2013 Study Guide:**

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**Jurisdiction to Tax Corporate Income Pursuant to the Presumptive Benefit Principle** Eva Escribano, 2019-05-10 Jurisdiction to Tax Corporate Income Pursuant to the Presumptive Benefit Principle intends to demonstrate that the profit shifting phenomenon, i.e., the ability of companies to book their profits in jurisdictions other than those that host their economic activities, is real, severe, undesirable, and above all, the natural consequence of both the preservation of three fundamental paradigms that have historically underlain corporate income taxes and their precise legal configuration. In view of this, the book submits a number of proposals in relation to the aforementioned paradigms and, in the light of the suggested presumptive benefit principle, so as to counteract profit shifting risks and thus attain a more equitable allocation of taxing rights among States. This PhD thesis obtained the prestigious European Academic Tax Thesis Award 2018 granted by the European Commission and the European Association of Tax Law Professors. What's in this book? This book provides a disruptive discourse on tax sovereignty in the field of corporate income taxation that endeavors to escape from long-standing tax policy tendencies and prejudices while considering the challenges posed by a globalized and increasingly

digitalized economy In particular the book offers an innovative perspective on certain deep rooted paradigms historically underlying corporate income taxation tax treatment of related parties within a corporate group along with the arm s length standard corporate tax residence standards and definition of source for corporate income tax purposes with a particular emphasis on the permanent establishment concept The book explores their respective origins supposed tax policy rationales structural problems and interactions ultimately showing how the way tax jurisdiction is currently defined through them inherently tends to trigger profit shifting outcomes In view of the conclusions of the study the author suggests the use of a new version of the traditional benefit principle the presumptive benefit principle that would contribute to address the profit shifting phenomenon while serving as a practical guideline to achieve a more equitable allocation of taxing rights among jurisdictions Finally the book submits a number of proposals inspired by the aforementioned guideline that aspire to strike a balance between equity effectiveness and technical feasibility They include a new corporate tax residence test and most notably a proposal on a new remote sales permanent establishment How this will help you With its case study based on the Apple group empirically demonstrating the existence of the profit shifting phenomenon its clearly documented exposure of the reasons why traditional corporate income tax regimes systematically give rise to these outcomes its new tax policy guideline and its proposals for reform this book makes a significant contribution to current tax policy discussions concerning corporate income taxation in cross border scenarios It will be warmly welcomed by all concerned policymakers scholars practitioners with the greatest tax policy challenges that corporate income taxation is facing in the contemporary world

**Ethics and Taxation** Robert F. van Brederode,2019-11-02 This book does not present a single philosophical approach to taxation and ethics but instead demonstrates the divergence in opinions and approaches using a framework consisting of three broad categories tax policy and design of tax law ethical standards for tax advisors and taxpayers and tax law enforcement In turn the book addresses a number of moral questions in connection with taxes concerning such topics as the nature of government the relation between government the state and its subjects or citizens the moral justification of taxes the link between property and taxation tax planning evasion and avoidance corporate social responsibility the use of coercive power in collecting taxes and enforcing tax laws ethical standards for tax advisors tax payer rights the balance between individual rights to liberty and privacy and government compliance and information requirements the moral justification underlying the efforts of legislators and policymakers to restructure society and steer individual and corporate behavior

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perspective Written in an accessible style this text assumes that the student has no previous education in taxation Byrd Chen's Canadian Tax Principles 2009 2010 Edition can be used with or without other source materials this includes the Income Tax Act Information Circulars Interpretation Bulletins and other official materials The Income Tax Act is referenced in the text where appropriate for further independent study Students should be able to solve all of the end of chapter problems by relying solely on the text as a reference The text and problem materials are comprehensive of the syllabus requirements of the CGAs CAs and CMAs Byrd and Chen's Canadian Tax Principles, 2011-2012 Edition Clarence E. Byrd, 2011 Study Guide to Accompany Byrd and Chen's Canadian Tax Principles Clarence E. Byrd, 2020 **Credit Method Compatibility and Constraints under EU Law** Rita Julien, 2022-01-13 As European Union EU Member States seek to counteract base erosion and profit shifting BEPS practices while avoiding new obstacles to the EU's internal market such as double taxation the credit method also known as the foreign tax credit is one of the essential tools in this balancing act yet it is one that has given rise to various EU law challenges and questions This invaluable book the first in depth study of the EU law constraints on designing the credit method delineates the EU law boundaries within which the Member States must operate when they implement this method of tax relief For the first time the Court of Justice of the European Union CJEU cases that may affect directly or indirectly the credit method and its main components are systematically identified and analysed in order to extract the legal findings and principles that define the contours within which the Member States can manoeuvre when considering EU compatible approaches to the credit method To this end among others this book offers an extensive study of the historical legal developments of the credit method an overview of the key design features of the credit method considering the optional variable components such as the credit limitation maximum creditable amount that tailor it to different legal and policy considerations an analysis of the legal constraints on the key features of the credit method flowing from CJEU case law on the fundamental freedoms considering the impact of landmark cases and concepts e.g. Schumacker neutralization the EU law implications based on the type of credit method direct indirect imputation and the feature of the credit method e.g. credit limitation credit carryforward and examples to clearly and concisely illustrate the basic operation of the credit method and some of the main calculation and EU law issues The author's doctoral dissertation on which the book is based was awarded the Wolfgang Gassner Science Prize 2020 and the European Doctoral Tax Thesis Award 2020 As a timely comprehensive and practical study of the relationship between the credit method and EU law this book will be welcomed by lawyers and other professionals working with taxation matters as well as by tax policymakers and academics in the fields of international and European tax law The Welsh Language Commissioner in Context Diarmait Mac Golla Chríost, 2016-07-20 it is the first book on the subject much of the research data provides a unique insight to the development of government policy and is exclusive to this book several of the research results are quite striking and will be of great interest to academics and policy actors alike **The Independent Study Catalog** National University Continuing Education Association (U.S.), 1989

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