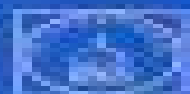


Basic International Taxation

Volume 1: Principles



Roy Rohatgi



Basic International Taxation

Lynne Oats



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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, 2021-09-30 The book 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. Traditionally published every 2 years in both print and digital formats, this content is a core requirement for student reading lists at both undergraduate and postgraduate level. Fully updated to cover all new tax legislation and developments in light of the OECD BEPS project implementation, key areas to be included in this new edition are changes proposed by BEPS 2.0 in relation to taxation and the digital economy, including Pillar Two and the proposed new UN Model Article 12B, further progress on the implementation of OECD Base Erosion and Profit Shifting, implementation including an update on the implementation of BEPS recommendations, including artificial avoidance of permanent establishment status and prevention of treaty abuse, the implementation of transfer pricing documentation and country-by-country reporting, multilateral instrument implementation, the impact of Covid 19 on international taxation, further developments in European direct taxation, including the transparency package, directives on anti-tax avoidance and the common corporate tax base and state aid cases, Apple in particular, and updates to the Directive on Administrative Cooperation and the new communication on Business Taxation for the 21st

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Basic International Taxation: Principles Roy Rohatgi, 2005 Basic International Taxation Roy Rohatgi, 2007-01-01 **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

BASIC INTERNATIONAL TAXATION Volume 2, 2005 **The International Tax Law Concept of Dividend** Marjaana Helminen, 2017-05-02 The distribution of profits between corporations resident in different jurisdictions gives rise to both significant tax planning opportunities and tax risks. As cross-border transactions between corporations grow in number and complexity, the question of how a profit distribution is classified for corporate income tax purposes becomes increasingly important, particularly in the context of issues such as double taxation, non-taxation, and tax neutrality. The OECD BEPS project has only increased the relevance. This unique work discusses the international tax law rules determining which transactions may be classified and taxed as dividends and how possible classification conflicts may be resolved. The author examines the tax classification of various inter-corporate transactions including Payments made under dividend stripping arrangements, Fictitious profit distributions, Economic benefits in the context of transfer pricing, Returns on debt-equity hybrids, Interest payments in thin capitalization situations, and distributions following liquidation. The analysis of each transaction refers to international tax law. Most weight is given to tax treaties and EU tax law, including the BEPS development. The approaches adopted in different states' national tax law are covered by a more general analysis. The comprehensive coverage and the practical nature of *The International Tax Law Concept of Dividend* make it an essential acquisition for tax practitioners, researchers, and tax libraries worldwide

Taxation of Cross-border Partnerships Jesper Barenfeld, 2005 Aims to identify and analyse problems related to double taxation of income attributable to cross-border partnerships in asymmetrical situations *de lege lata*. This refers to cases where the same partnership in a cross-border owner entity situation is recognized as a taxable person in one country but as transparent for tax purposes in the other

Basic International Taxation: Practice of international taxation Roy Rohatgi, 2005 Basics of International Taxation Martin Berglund, 2018 This book aims at guiding the reader in his or her very first meeting with international tax law. For the purposes of the book, international tax law is divided into three closely interrelated parts: domestic, international, and tax law.

treaty law and EU tax law The book focuses on the method used when solving problems of international taxation Different methods are used in the three different parts of international tax law but when dealing with a specific situation all three parts must regularly be considered It is vital for students as well as for practitioners to understand the methodological approaches when addressing issues of international taxation No other textbook has taken this very basic and methodological perspective on international tax law The book is filled with examples that aim at illustrating how the rules principles and concepts of the legal field are used in practice **Fundamentals of International Taxation** Boris I. Bittker,2008 **Roy Rohatgi on**

International Taxation : Volume 1 : Principles Sophia Akhtar,2018 This book is an introductory text for practitioners and students of international tax law For many years this two volume title has enjoyed a reputation as one of the leading handbooks in this complex area of taxation With the latest rewrite of this work the authors provide in depth treatment of the key topics in international tax building up from detailed explanation of the basic concepts all the way to solid analysis of the complex transactional issues This Volume 1 Principles lays the foundation for this two volume set It examines international taxation through the prism of domestic law explaining the conflicts of laws that give rise to issues seeking resolution in the international arena This volume also introduces the world of tax treaties crucially focusing on income and capital tax treaties as well as on the main treaties that concern the administration and collection of taxes in the international sphere In its analysis of income and capital tax treaties this book takes the OECD Model Convention as the starting point and enriches the discussion with examples from real life treaties as well as by contrasting provisions from other Model treaties The book is rounded out by a generous analysis of jurisprudence from all over the world *CCH Guide to Researching Canadian Income Tax* Yoko Beriault,Carol Mohammed,2005-08

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

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International Taxation Paul R. McDaniel, Hugh J. Ault, 1981-06-17 This book presents the basic principles and rules of the United States international tax system in a relatively brief form The purpose is to provide an overview of 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 **Global Perspectives on Income Taxation Law** Reuven Shlomo Avi-Yonah, Nicola Sartori, Omri Marian, 2011 In Global Perspectives on Income Taxation Law Avi Yonah covers basic corporate and international tax law from a comparative perspective The book both supplements readings in U S tax law courses and serves as a textbook for a comparative tax law class It is arranged by subject matter in the order in which they are usually covered in U S tax law classes The materials are drawn from a wide variety of countries including developing countries *International Taxation* Joseph Isenbergh, 2006

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