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(Springer Texts in Business and Economics) 2013th Edition by Ulrich Schreiber (Author), Peter Müller (Contributor)

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The foreign corporation will be subject to U.S. income tax on its effectively connected income, and will also be subject to the branch profits tax on any of its profits not reinvested in the U.S. [citation needed] Thus, many countries tax corporations under company tax rules and tax individual shareholders upon corporate distributions. Various countries have tried (and some still maintain) attempts at partial or full "integration" of the enterprise and owner taxation.

International taxation - Wikipedia

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 ...

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the proposed EU Common Consolidated Corporate Tax Base (CCCTB). International Company Taxation and Tax Planning by Dieter Endres and Christoph Spengel will be welcomed by practitioners engaged in the field of international taxation, whether they work in companies, law firms, or government. Interested academics will find here an unmatched comparative analysis of the global web of international taxation law and practice.

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An inquiry of this nature usually consists of two components: (1) whether the foreign company has sufficient in-state contacts to be subject to a state income, gross-receipts, or net-worth tax; and (2) whether the company would incur a tax liability if it were subject to tax. Doing business and nexus. Generally, a foreign company's state tax ...

State tax considerations for foreign companies with ...

this book offers an introduction to the legal and economic fundamentals of international company taxation it is written for students of business economics and tax law striving to understand how taxes influence investment and financing decisions in cross border situations the focus of the book is on the key tax drivers shaping the tax planning strategies of multinational companies

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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 ...

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In this edition of Inside Deloitte, the authors consider the various income tax nexus theories that state tax agencies may apply to companies located outside the United States, as well as other approaches that states may use to tax the income of a foreign company, including worldwide filing regimes, state tax haven laws, and other inclusionary rules for combined filing states.

Foreign companies and state income tax nexus | Deloitte US

Our international tax professionals are well-equipped to serve the specific needs of large international corporations, foreign nationals, high net worth individuals, family business owners and local business operators, among others. The right approach to international tax issues can be critical to business success.

International Tax | Marcum LLP | Accountants and Advisors

So, as we progress through this module we can start creating an understanding of international

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Tax planning structures based on the newly acquired knowledge about corporate taxes. In this first video, I want to focus on Corporate income tax. Which is also, depending on the country involved, referred to as Company income tax, or Corporation tax.

Introduction to Corporate Income Tax - Design of corporate ...

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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

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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.

The massive and growing increase in international trade and investment make it increasingly important for corporate counsel and tax practitioners to understand the complexity of tax systems worldwide and to plan for optimal specific arrangements in each cross-border business operation. International tax planning stands to be enormously enhanced by the kind of analysis presented in this one-of-a-kind book, combining as it does detailed information on tax law in scores of jurisdictions and practical guidance on international tax planning approaches.

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This Second Edition provides an updated and succinct, yet highly informative overview of the key issues surrounding taxation and international law from Reuven Avi-Yonah, a leading authority on international tax. This small but powerful book surveys the nuances of the varying taxation systems, offering expert insight into the scope, reach and nature of international tax regimes, as well as providing an excellent platform for understanding how the principles of jurisdiction apply to tax and the connected tools that are used by countries in imposing taxes. It includes new material on BEPS, the EU Anti Tax Avoidance Package, and the US Tax Cuts and Jobs Act.

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 jurisdicatio

This superb book will guide the reader through the key issues and practical aspects of international tax practice. It demonstrates how different global tax systems interact and how to prevent paying more tax than necessary. The basic principles of each aspect of international taxation are outlined and then examined in greater depth and detail. This updated third edition includes coverage of both UK and EU legislation and regulation, as well as the key cases and rulings. Complicated double taxation concepts are clearly illustrated with examples and diagrams to help the reader quickly understand how they'll apply in practice. Examples of

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policies adopted in other countries are included, along with specialist commentary and guidance.

The book describes the difficulties of the current international corporate income tax system. It starts by describing its origins and how changes, such as the development of multinational enterprises and digitalization have created fundamental problems, not foreseen at its inception. These include tax competition—as governments try to attract tax bases through low tax rates or incentives, and profit shifting, as companies avoid tax by reporting profits in jurisdictions with lower tax rates. The book then discusses solutions, including both evolutionary changes to the current system and fundamental reform options. It covers both reform efforts already under way, for example under the Inclusive Framework at the OECD, and potential radical reform ideas developed by academics.

The tax rules of the United States and other countries have intended and unintended effects on the operations of multinational corporations, influencing everything from the formation and allocation of capital to competitive strategies. The growing importance of international business has led economists to reconsider whether current systems of taxing international income are viable in a world of significant capital market integration and global commercial competition. In an attempt to quantify the effect of tax policy on international investment choices, this volume presents in-depth analyses of the interaction of international tax rules and the investment

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decisions of multinational enterprises. Ten papers assess the role played by multinational firms and their investment in the U.S. economy and the design of international tax rules for multinational investment; analyze channels through which international tax rules affect the costs of international business activities; and examine ways in which international tax rules affect financing decisions of multinational firms. As a group, the papers demonstrate that international tax rules have significant effects on firms' investment and other financing decisions.

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