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# Kpmg International Tax Guide

**Guillaume Favre**



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**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

**International Taxation of Energy Production and Distribution** John Abrahamson, 2018-04-20 Energy is a major global industry with rapid ongoing changes in areas such as carbon taxes emissions trading regimes and the development of renewable energy The cross border nature of the industry calls for the thorough expert and up to date analysis provided in this timely and practical book Taking a down to earth problem solving approach to policy and practice in the field worldwide the author focuses on the international tax framework and the tax regimes in leading energy producing and consuming countries The book introduces and analyses significant international tax issues related to energy production and distribution extending from the tax regime in the country where the oil gas or coal exploration and production activities are located through to cross border transportation using pipelines tankers and bulk carriers to the taxation of power stations and electricity transmission and distribution networks The taxation issues covered include the following upstream oil and gas and mining taxes incentives for renewable energy carbon taxes and emission trading regimes dividend interest and royalty flows foreign tax credits permanent establishments mergers and acquisitions taxation issues for derivatives and hedging transfer pricing regional purchasing marketing service and intangible property structures free trade agreements and customs unions dispute resolution and tax administration and risk management Detailed updates are included on the most recent international tax developments affecting the energy industry including the

OECD Action Plan on Base Erosion and Profit Shifting BEPS and the 2017 OECD Transfer Pricing Guidelines Case studies offer an opportunity to apply international tax analysis to specific examples and gain practice in identifying and discussing relevant international taxation issues This book will be of significant value to corporate tax managers and in house counsel together with accountants lawyers economists government officials and academics connected with the energy industry and related international taxation issues International Taxation of Banking John Abrahamson, 2020-02-20 Banking is an increasingly global business with a complex network of international transactions within multinational groups and with international customers This book provides a thorough practical analysis of international taxation issues as they affect the banking industry Thoroughly explaining banking s significant benefits and risks and its taxable activities the book s broad scope examines such issues as the following taxation of dividends and branch profits derived from other countries transfer pricing and branch profit attribution taxation of global trading activities tax risk management provision of services and intangible property within multinational groups taxation treatment of research and development expenses availability of tax incentives such as patent box tax regimes swaps and other derivatives loan provisions and debt restructuring financial technology FinTech group treasury interest flows and thin capitalisation tax havens and controlled foreign companies and taxation policy developments and trends Case studies show how international tax analysis can be applied to specific examples The Organisation for Economic Co operation and Development Base Erosion and Profit Shifting OECD BEPS measures and how they apply to banking taxation are discussed The related provisions of the OECD Model Tax Convention are analysed in detail The banking industry is characterised by rapid change including increased diversification with new banking products and services and the increasing significance of activities such as shadow banking outside current regulatory regimes For all these reasons and more this book will prove to be an invaluable springboard for problem solving and mastering international taxation issues arising from banking The book will be welcomed by corporate counsel banking law practitioners and all professionals officials and academics concerned with finance and its tax ramifications **BRICS and International Tax Law** Peter Antony Wilson, 2016-04-24 With the ongoing expansion of outbound foreign direct investment FDI in the countries representing the BRICS economic bloc Brazil Russia India China and South Africa and with all of them at the same time listed among the top seven countries plagued by tax evasion and avoidance in the guise of illicit out flows the ve governments both individually and through cooperative initiatives have devised new international tax strategies that are proving to be of great interest and value to other countries both developing and developed The core of these strategies addresses the necessity of stemming the out ow of revenue while strongly supporting FDI both inbound and outbound while complying with international obligations including those arising from human rights laws This book is the rst in depth commentary on this new and evolving area of international tax law The detailed analysis covers the entire eld of BRICS international tax law considering topics such as the following information exchange procedures and pitfalls response to the OECD s Base Erosion

and Pro t Sharing BEPS initiative role of bilateral and multilateral double taxation conventions including the Multilateral Instrument and the Bilateral Investment Treaties thin capitalization transfer pricing controlled foreign corporation rules shortcomings related to authorities limited manpower international audit and investigation procedures the BRICS approach to residence and mandatory and binding arbitration and the BRICS approach to shaping the developing world s international tax system Notably the author personally conducted interviews with senior international representatives of the BRICS tax authorities as well as with leading BRICS academics and practitioners Tax cases together with human rights and investment cases and administrative guidelines in all ve countries are also included in the analysis The study concludes with recommendations for improving each of the ve countries tax law and procedures especially in the area of dispute resolution The author s goal is to extend the existing body of knowledge of the BRICS international tax laws in order to assist in developing an understanding of the BRICS approach to dealing with evasion and avoidance an approach which facilitates both outbound and inbound FDI simpli es tax authority administration and establishes a basis for resolving international disputes which is compatible with sovereignty In achieving this objective the author has produced a major work that is of immeasurable value to tax advisers government and governance of cials academics and researchers both in developing international taxation strategies and in helping to resolve disputes with tax authorities

**2003 International Tax Havens Guide** Barry Spitz, 2002 This comprehensive guide reveals precisely how each tax haven works for individuals corporations trusts and any other entity that wants to reduce today s crushing tax burden You will not find a more complete information service of international offshore financial centers Learn all of the world s best techniques to LAWFULLY slashing taxes There are more than 40 country analyses Each analysis includes Geographic and demographic data Political and economic stability Legal system and form of government Tax treaties and double taxation Disclosure information Social Security tax import duties capital gains tax Types of corporations includes a checklist Banking Also includes a companion CD ROM containing a wide array of client letters proposals checklists and much more

The Journal of International Taxation ,2001 **Tax Notes International** ,2005 The IFLR Guide to Germany ,2001 **Bulletin for International Fiscal Documentation**

,2000 **Israeli Business Law : An Essential Guide** Alon Kaplan,1996-10-17 Israeli Business Law An Essential Guide is an indispensable reference work for lawyers accountants business people interested in the legal tax business environment in Israel The earlier edition of Israeli Business Law An Essential Guide has proven to be such a success that the need for a second printing revised edition has become apparent The book is arranged into eight broad topics written by experts in their fields including judges lawyers tax experts from Israel abroad other professionals It also covers aspects of the peace process business law in the Palestinian Autonomous Areas This revised edition takes into account recent legislation in Exchange Control regulations taxation company laws as well as the latest developments in the peace process In addition chapters on Private Banking E commerce have been added For easy use an index has been included *Trade Services Directory & Guide*

,2004     **The Taxation of Companies in Europe** International Bureau of Fiscal Documentation,1998     *Vault Guide to the Top 100 Law Firms* ,2002 Annually updated insider s guide to law firms an unbiased investigative and comprehensive look at the top law firms in the country based on surveys of more than 10 000 lawyers     *Tax Treatment of Financial Instruments:A Survey to France, Germany, The Netherlands and the United Kingdom* G. M. M. Michielse,1996-04-17 General overview of the tax treatments of various financial instruments in four important EC Member States France Germany the Netherlands and the United Kingdom showing the most important tax differences and outlining the points on which EC harmonization is the most imperative but also the most difficult to realize     Trade Services Directory and Guide 2004 Commonwealth Business Media, Incorporated,2003     **Export Handbook** Robert Feinschreiber,1997-01-17 With the passage of GATT and NAFTA trade barriers worldwide have been reduced or eliminated This book provides legal accounting and tax strategies for those entering or already participating in the lucrative area of exports     *Mergers & Acquisitions* ,2001     *The Big Eight Review* ,1987     **The European Legal 500** John M. Pritchard,2000     **Economic and Social Survey of Asia and the Pacific 2014** ,2014 The Survey 2014 examines the region s challenges to support its economic growth and to promote inclusive and sustainable development Part I of the report focuses on the region s outlook as it contends with the ongoing global economic uncertainty and assesses the region s policy response to remaining and emerging vulnerabilities It also examines the role of sustainable agriculture in closing the development gaps in least developed countries A special theme is domestic resource mobilisation in the region which explores the challenges on strengthening tax revenues Part II of the report discusses strategic approaches to strengthen regional connectivity to achieve shared prosperity particularly the ways in which various networks facilitate trade production networks and investment flows within the region

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