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Questions
and Suggested
Solutions

22nd Edition

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Australian Taxation Study Manual 2012

Philip Alston, Nikki Reisch



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for effective tobacco tax policy development design implementation and administration This 2021 edition also serves as an update to the 2010 manual incorporating the latest developments in science technology and policy as well as providing illustrative recent examples from a variety of countries The best practices laid out in this manual are designed to inform governments on the development of their tobacco taxation policy facilitating the achievement of their health and revenue objectives while also supporting their overall development strategy

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Yariv Brauner, 2020-12-25 Capturing the core challenges faced by the international tax regime this timely Research Handbook assesses the impacts of these challenges on a range of stakeholders evaluating various paths to reform at a time when international tax policy is a topic high on politicians agendas

Tax, Inequality, and Human Rights

Philip Alston, Nikki Reisch, 2019-04-11 This book examines why taxation is central to the enjoyment or suppression of human rights in an age of rising nationalism authoritarianism and disillusionment with the traditional role of the state Taxation and human rights are at the heart of debates about the appropriate balance in society between the public and private sectors and ultimately the content of a new social contract

Beneficial Ownership in International Tax Law

Angelika Meindl-Ringler, 2016-06-07 In international tax law the term beneficial ownership refers to which parties involved in a cross border transaction are entitled to tax treaty benefits However determining beneficial ownership is a complex and often disputed issue subject to different meanings in different countries Archival research on its early use in tax treaties and in the developing OECD Model reveals that its meaning has changed dramatically over the decades leading to new interpretations significantly affecting current tax practice and scholarship This book dedicated to establishing how beneficial ownership should ideally be interpreted compares the use and interpretation of beneficial ownership both current and historical in a wide range of national jurisdictions as well as the EU ultimately shedding a clearer light than has heretofore been available on the meaning of the term In her very thorough analysis of the application of beneficial ownership the author touches on such aspects as the following historical development of the beneficial ownership requirement as used in tax treaties and in the OECD Model Tax Convention on Income and on Capital rules of double taxation conventions application of the OECD s Action Plan on Base Erosion and Profit Shifting BEPS the problem of so called white income use of the substance over form principle attribution of income rules and the role of agents nominees and conduit companies Specific analysis of the use and interpretation of beneficial ownership in a domestic law and treaty context in numerous jurisdictions with particular emphasis on the United Kingdom Australia the United States and Germany is a major feature of the presentation As a thorough guide to determining whether a person claiming tax treaty benefits is the true owner and which parties are excluded from treaty benefits and to what extent this book will be of immeasurable value to lawyers tax authorities policymakers and other professionals working with taxable international transactions of any kind

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