

Basic International Taxation

Volume 1: Principles



Roy Rohatgi



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Yan Bai



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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 post graduate 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 implantation 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 Century Proposals in relation to the taxation of digital business in particular the OECD s unified approach and the UN modifications to the Model Double Taxation Convention Proposals for a global minimum corporate tax rate to curb base erosion and tax competition

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 post graduate 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 Century. Proposals in relation to the taxation of digital business in particular, the OECD's unified approach and the UN modifications to the Model Double Taxation Convention. Proposals for a global minimum corporate tax rate to curb base erosion and tax competition.

The International Taxation System Andrew Lymer, John Hasseldine, 2012-12-06

International taxation is a vital issue for a growing number of business and individuals across the world. The need to understand how the international system of taxation works is therefore a subject of importance to many people. The International Taxation System provides this understanding by bringing together experts from the most important fields in the subject who have each authored chapters especially for this book. They each provide brief, structured and easy to understand explanations of the key concepts, edited together into one volume to provide a unique, very readable guide to the field. While this text is aimed at masters or advanced undergraduate level students, it will also be of interest to those requiring a professional understanding of the topic. Each chapter introduces a different aspect of the international taxation system, explains the important issues to be understood in each case and provides suggestions for discussion and further reading.

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