

Chapter 11: Multinational Corp. Tax Planning: Part 1

- The worldwide average statutory corporate tax rate has consistently decreased since 1980, with the largest decline occurring in the early 2000s
 - Highest: UAE (35%), Comoros (30%), Puerto Rico (37.5%)
 - Lowest: Barbados (2.5%), Uzbekistan (7.5%), Turkmenistan (8%)
 - No-Corporate Income Tax: Anguilla, Bahamas, Cayman Islands
- Worldwide average rate is somewhere around 24% (unweighted) and 20% (weighted)
- Examples of drivers for rate and internal tax policy:
 - Political pressures, Revenue needs, Special interests, Encourage exports, Increase worldwide competitiveness, Attract foreign capital
- Cross Border Commerce has put increasing pressures on tax systems
 - Moving away from a "worldwide taxation" system to a "territorial taxation" system

Chapter 12: Multinational Corp. Tax Planning: Part 2

- With TCJA, the US adopted a hybrid territorial tax system, generally no longer taxes certain earnings in certain foreign interests
 - Sec. 245A - Generally dividends paid to US corporate shareholders from their foreign holdings receive the participation exemption (100% DED), unless
 - From a less than 10% owned foreign C Corp
 - From a "branch" or partnership in a foreign country
 - Subject to "Subpart F" provisions of 10% or more corporate shareholders of CFCs
 - Subject to GILTI provisions of 10% or more corporate shareholders of CFCs
 - Subject to the BEAT provision
- GAAP requires deferred foreign income tax expense be recorded if the current foreign tax expense reduction or benefit is only temporary
 - Must adopt tax planning strategies that will permanently avoid taxes, either by having operations in a low tax country or by shifting profit
- Effective and successful foreign tax planning will achieve:
 - Reduced current US income tax expenses on the financial statements
 - Possible reduction of total book US income tax expense, permanently
 - Reduction in current foreign income tax expenses on the financial statements
 - Reduction in book foreign income tax expense, permanently
- The US will tax at 21% US source income earned by foreign corporation through a US branch, permanent establishment or US subsidiary corporation, and is classified into two categories:
 - Effectively connected income (ECI) - Tax on a net basis at 21%
 - FDAP - taxed on a gross basis via flat withholding tax (WHT max at 30%)
- MNCs must file in numerous jurisdictions under varying tax laws, then portion of tax expense is called foreign tax expense:
 - May be eligible as a credit (FTC)
- Up until 2018, US taxed all foreign earnings, now most foreign income earned by US businesses is no longer subject to current or future US income tax (exceptions)
- US taxpayer may choose how their business is formed either as a foreign corporation or a branch
 - Foreign Corporation Subsidiary

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R Bogdan



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