



Tolley's Customs and Excise Duties Handbook 2015-16

Volume 1
General

Consultant Editor: Jeremy White

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Tolley Customs Duties Handbook 2015

Jeremy White



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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.

Permanent Establishments Ekkehart Reimer, Stefan Schmid, Marianne Orell, 2018-06-07. Permanent Establishments (PEs) are a key facet of international taxation. They constitute the crucial threshold for the assignment of taxing rights to a jurisdiction in all cases of enterprises operating in more than one country. The issue of whether there is a PE and how much profit should be allocated to it is an increasingly important factor in tax planning, tax accounting, tax compliance and related tax risk management. Groundbreaking developments have reshaped the face of the classical PE concept during the year 2017. Following action item no 7 of the Anti-BEPS efforts of G20 and OECD, the OECD has presented the Multilateral Instrument (MLI) on Base Erosion and Profit Shifting in June 2017. Based on the MLI as well as earlier drafts, Article 5 of the OECD Model Tax Convention and the Official Commentary have been amended in November 2017. Similarly, Article 7 of the OECD Model Tax Convention on the allocation of income in PE situations is influenced by the October 2015 OECD BEPS proposals. This academically rigorous yet thoroughly practical work provides comprehensive guidance on a variety of complex PE issues. Its initial chapters analyse the latest OECD and EU developments in the context of Articles 5 and 7 of the OECD Model Tax Convention. 21 country chapters cover domestic PE issues as well as country specific treaty developments from a practical perspective. Contributors: Fabrizio Acerbis, Maret Ansperi, Yumiko Arai, Kos Burj, n Anna Berglund, Peter Collins, Mike Cooper, David Cuellar, Veronika Daurer, Frank Feng, Mikhail Filinov, Sandra Fleurier, Jose Antonio Gonzalez, Herbert Greinecker, S ren Jesper Hansen, Lars Elleg rd Holst, Mauricio Hurtado, Martin Jann, Renaud Jouffroy, David Lermer, Peter Lindblad, Iren Lipre, Jessica Ma, Anna Mallol, Dennis Matthijs, Hamish McElwee, Kunal Mehta, Osman Mollagee, Matthew Mui, Ram n Mullerat, Luis Felipe Mu oz, Stephen Nauheim.

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