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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 **Foreign Mining Investment Law**

Richard W. Roeder,2016-06-28 This work analyzes and compares the legal framework for foreign investments in the mining sector in Australia South Africa and Colombia The admission of foreign investments corporate structure requirements ownership of minerals and mineral rights mining licenses land access performance requirements distribution of profits and the tax regime repatriation of profits national and international dispute resolution mechanisms and the question of the Social License to Operate SLO Corporate Social Responsibility CSR policies are discussed in detail The work concludes with an outlook on the future regulation of foreign mining investments and finally suggests the development of an International Mining Investment Law Italy Tax Guide Volume 1 Corporate Taxation: Strategic, Practical Information, Regulations IBP,

Inc.,2007-02-07 Italy Tax Guide *Guide to Global Real Estate Investment Trusts* Stefano Simontacchi,Ilona

McElroy,Rosaleen Carey,2022-09-19 The global listed property sector has been characterized by a variety of noteworthy developments in recent times the proliferation of real estate investment trust type structures in countries around the world key among them Despite an uncertain economic environment REITs have proven their ability to promote institutional real estate investments in global financial markets This highly practical book features a comprehensive analysis of both the legal

and tax underpinnings of REIT friendly legislation in a variety of the world's most significant jurisdictions. With regard to the legal framework, the structure and functioning of a REIT are carefully investigated and explained. In terms of tax issues, the book focuses on such key issues as REIT formation, operation and liquidation, mergers, acquisitions and dispositions and planning for public and private REIT offerings and re-securitizations. REITs are inherently complex and their interplay with tax treaties further compounds the complexity. This highly accessible yet authoritative work is the perfect decision-making tool for any professional looking for perspective and guidance on the challenges and opportunities REITs engender.

Cybersecurity Issues, Challenges, and Solutions in the Business World Verma, Suhasini, Vyas, Vidhisha, Kaushik, Keshav, 2022-10-14 Cybersecurity threats have become ubiquitous and continue to topple every facet of the digital realm as they are a problem for anyone with a gadget or hardware device. However, there are some actions and safeguards that can assist in avoiding these threats and challenges; further study must be done to ensure businesses and users are aware of the current best practices. *Cybersecurity Issues, Challenges, and Solutions in the Business World* considers cybersecurity innovation alongside the methods and strategies for its joining with the business industry and discusses pertinent application zones such as smart city, e-social insurance, shrewd travel and more. Covering key topics such as blockchain, data mining, privacy, security issues and social media, this reference work is ideal for security analysts, forensics experts, business owners, computer scientists, policymakers, industry professionals, researchers, scholars, academicians, practitioners, instructors and students.

Taxation, Human Rights, and Sustainable Development Eghosa O. Ekhator, Newman U. Richards, Chisa Onyejekwe, 2025-06-26 This book investigates the relationship between human rights and taxation, exploring how human rights have been impeded or enhanced through tax laws and policies and what this means for sustainable development in the Global South. Drawing on cases from across the Global South, the book demonstrates the benefits of embedding human rights into tax policies and legislation. The authors not only highlight the role of legislative measures and other human rights regulations in the realisation of international treaty rights but also argue that it creates an environment whereby individuals feel duty-bound to pay taxes when necessary, thereby securing a sustainable revenue source for the state to meet their socio-economic responsibilities. The book investigates key topics such as compliance, redistribution, e-commerce, tax havens and the role of key stakeholders. This book will be useful for researchers from across the fields of law, human rights, taxation and sustainable development.

Modernizing VATs in Africa Sijbren Cnossen, 2019 This book provides a comprehensive survey and analysis of VATs in Africa. It enables policymakers and students to examine Africa's VAT systems and to ascertain how it can be modernized to finance human and economic development.

The Rise of the Value-Added Tax Kathryn James, 2015-04-30 Explores how the value added tax (VAT) has risen from relative obscurity to become one of the world's most dominant revenue instruments.

Taxing Africa Mick Moore, Wilson Prichard, Odd-Helge Fjeldstad, 2018-07-15 Taxation has been seen as the domain of charisma-free accountants, lawyers and number crunchers, an unlikely place to encounter big

societal questions about democracy equity or good governance Yet it is exactly these issues that pervade conversations about taxation among policymakers tax collectors civil society activists journalists and foreign aid donors in Africa today Tax has become viewed as central to African development Written by leading international experts Taxing Africa offers a cutting edge analysis on all aspects of the continent's tax regime displaying the crucial role such arrangements have on attempts to create social justice and push economic advancement From tax evasion by multinational corporations and African elites to how ordinary people navigate complex webs of informal local taxation the book examines the potential for reform and how space might be created for enabling locally led strategies

Tax Justice and Global Inequality Krishen Mehta, Esther Shubert, Erika Dayle Siu, 2020-10-29 In the wake of the Panama Papers scandal and similar leaks tax havens are now firmly in the spotlight Today roughly half of all global trade still passes through tax haven jurisdictions costing millions in lost revenue to countries around the world Such practices affect all of us but are most keenly felt by poorer people in developing countries where unfair tax practices have become a major obstacle to development and which have allowed multinational corporations to continue to exploit developing economies This collection argues that for developing countries to achieve social justice and lasting prosperity they must take control of their own tax destinies and that this will also be crucial to achieving the Sustainable Development Goals Covering such topics as natural resource management representation in global tax institutions and effective strategies for building and protecting tax bases the collection brings together expertise from a variety of countries and disciplines It explores the options available to developing countries and provides a basis for concerted action by tax authorities policy makers academics and civil society experts to design tax systems that can sustain a just society

Capital Gains Taxation Michael Littlewood, Craig Elliffe, 2017-08-25 Capital gains taxes pose a host of technical and political design problems and yet while the literature on the theory of capital gains taxation is substantial little has been published on how governments have addressed these dilemmas Written by a team of distinguished international experts Capital Gains Taxation addresses the gap in the literature it explains how a number of countries tax capital gains and the successes and pitfalls of these methods

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 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 flow 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 first in depth commentary on this new and evolving area of international tax law The detailed analysis covers the entire field of BRICS international tax law considering topics such as the

following information exchange procedures and pitfalls response to the OECD's Base Erosion and Profit 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 46 countries are also included in the analysis The study concludes with recommendations for improving each of the 46 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 simplifies 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 46 countries academics and researchers both in developing international taxation strategies and in helping to resolve disputes with tax authorities

Transfer Pricing and Developing Economies Joel Cooper, Randall Fox, Jan Loeprick, Komal Mohindra, 2017-01-05 Recent years have seen unprecedented public scrutiny over the tax practices of Multinational Enterprise MNE groups Tax policy and administration concerning international transactions aggressive tax planning and tax avoidance have become an issue of extensive national and international debate in developed and developing countries alike Within this context transfer pricing historically a subject of limited specialist interest has attained name recognition amongst a broader global audience that is concerned with equitable fiscal policy and sustainable development Abusive transfer pricing practices are considered to pose major risk to the direct tax base of many countries and developing countries are particularly vulnerable because corporate tax tends to account for a larger share of their revenue This handbook is part of the wider WBG engagement in supporting countries with Domestic Resource Mobilization DRM by protecting their tax base and aims to cover all relevant aspects that have to be considered when introducing or strengthening transfer pricing regimes The handbook provides guidance on analytical steps that can be taken to understand a country's potential exposure to inappropriate transfer pricing transfer mispricing and outlines the main areas that require attention in the design and implementation of transfer pricing regimes A discussion of relevant aspects of the legislative process including the formulation of a transfer pricing policy and the role and content of administrative guidance is combined with the presentation of country examples on the practical application and implementation of the arm's length principle and on running an effective transfer pricing audit program Recognizing the importance of transfer pricing regulation and

administration for the business environment and investor confidence this handbook aims to balance the general objective of protecting a country's tax base and raising additional revenue with investment climate considerations wherever appropriate

Sub-Saharan Africa Ms. Janet Gale Stotsky, Ms. Lisa Kolovich, Suhaib Kebhaj, 2016-08-20 Gender budgeting is an initiative to use fiscal policy and administration to address gender inequality and women's advancement. A large number of sub-Saharan African countries have adopted gender budgeting. Two countries that have achieved notable success in their efforts are Uganda and Rwanda, both of which have integrated gender-oriented goals into budget policies, programs, and processes in fundamental ways. Other countries have made more limited progress in introducing gender budgeting into their budget making. Leadership by the ministry of finance is critical for enduring effects, although nongovernmental organizations and parliamentary bodies in sub-Saharan Africa play an essential role in advocating for gender budgeting.

Legal Duty and Upper Limits Bernd Reiter, 2020-11-27 This book proposes a radical new way of thinking about our democratic future, our ecological survival, and our ways to keep economies fair. It shows that adopting upper limits to wealth and income, replacing elections with local direct democracy, and legal duty involving randomly selected citizens and replacing welfare and redistribution policies with pre-distribution and reparations promises new solutions to political apathy, discontent, manipulation, economic inequality, unfairness, unequal opportunities, and looming ecological disaster.

Environmental Subsidies to Consumers Shigeru Matsumoto, 2015-06-12 A typical consumer underestimates the benefits of future energy savings and underinvests in energy efficiency relative to a description of the socially optimal level of energy efficiency. To alleviate this energy efficiency gap problem, various programs have been implemented. In recent years, many governments have started providing consumers with subsidies on the purchases of eco-friendly products such as hybrid cars and energy-efficient appliances. This book conducts a comprehensive analysis of the environmental subsidy programs conducted in Japan and examines their impacts on consumer product selection, consumer product use, and environmental outcome. The book also proposes recommendations for future environmental and industrial policies. The book's empirical findings will be of interest to those who are researching on and policymakers of environmental and industrial policies.

How South Africa Works Jeffrey Herbst, Greg Mills, 2015-07-01 The overwhelming challenge that South Africa faces and has to date failed to address is unemployment, which falls especially on African youths who were promised a better future after 1994. If the current unemployment challenge is not addressed, it will be impossible to sustainably lift many millions of people out of poverty. *How South Africa Works* reviews the country's major economic achievements over the past two decades. Through numerous interviews with politicians, business leaders, and analysts, it examines the challenges and opportunities across key productive sectors including agriculture, manufacturing, services, and mining, illustrative of the policy challenges that leaders face. It scrutinises the social grant and education systems to understand if South Africa has established mechanisms for people not only to escape destitution but be ready to be employed and identifies steps that some of South Africa's most notable

entrepreneurs have taken to build world class enterprises Recognising the essential challenge to cultivate more employers to employ people How South Africa Works concludes by offering an agenda and active steps for greater competitiveness for government business and labour *Advances in Taxation* John Hasseldine,2020-12-09 This volume explores the latest issues in tax and taxation theory including empirical studies using research methods from different institutional settings and contexts It is essential reading for anyone interested in tax policy and its impact in practice *Eurasian Regionalisms and Russian Foreign Policy* Mikhail A. Molchanov,2016-03-03 Bridging foreign policy analysis and international political economy this volume offers a new look at the problem of agency in comparative regional integration studies It examines evolving regional integration projects in the Eurasian space defined as the former Soviet Union countries and China and the impact that Russian foreign policy has had on integration in the region Mikhail Molchanov argues that new regionalism in Eurasia should be seen as a reactive response to contemporary challenges that these developing states face in the era of globalization Regional integration in this part of the world treads the unknown waters and may not simply repeat the early steps in the evolution of the European Union The question of a hegemonic leadership in particular as exercised by a country that spearheads regional integration efforts animates much of the discussion offered in the book Moreover Eurasian regionalisms are plural phenomena because of complementary and competing projects that engage the same or partially overlapping groups of countries By combining foreign policy studies with an examination of the international political economy of regionalism in Eurasia the author furthers our understanding of new regionalism both theoretically and empirically

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