

Fundamentals Of Federal Income Taxation 17th Edition

Living in Singapore (17th Edition Reference Guide) Hong Kong Master Tax Guide 2008/09 Tax Compliance in Greater China Hybrid Financial Instruments in International Tax Law Double Taxation in Europe A Catalogue of the Law Collection at New York University A Complete Collection of the Treaties and Conventions, and Reciprocal Regulations at Present Subsisting Between Great Britain and Foreign Powers ... The CCH Journal of Asian Pacific Taxation Tax Strategy Vs. Countermeasures Palgrave's Dictionary of Political Economy: F-M (1923 New ed.) Revised Civil Statutes and Laws Passed by the 16th, 17th, 18th, 19th, & 20th Legislatures of the State of Texas The American Catalogue Dictionary of Political Economy The American Catalog Law Books in Print: Subjects Consolidated Report of the Municipal Officers of the City of Milwaukee, Wis House Documents Corporate History of the Pennsylvania Lines West of Pittsburgh Minutes of Evidence Taken Before the Royal Commission on Local Taxation The National Corporation Reporter Melinda Murphy Jakob Bundgaard Florian Haase Julius J. Marke Great Britain Naoki Matsuda Robert Harry Inglis Palgrave Texas Robert Harry Inglis Palgrave Nicholas Triffin Milwaukee (Wis.) USA House of Representatives Great Britain. Royal Commission on Local Taxation

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financial innovation allows companies and other entities that wish to raise capital to choose from a myriad of possible instruments that can be tailored to meet the specific business needs of the issuer and investor however such instruments put increasing pressure on a question that is fundamental to the tax and financial systems of a country the distinction between debt and equity focusing on hybrid financial instruments hfis which lie somewhere along the debt equity continuum but where exactly depends on the terms of the instrument as well as on applicable laws this book analyses their treatment under both domestic law and tax treaties key jurisdictions including the eu some of its member states and the united states are covered advocating for a broader scope of application of hfis as part of the financing of companies in europe alongside traditional sources of debt and equity financing the book addresses such issues and topics as the following problems associated with the debt equity distinction in international tax law cross border tax arbitrage and linking rules drivers behind the use and design of hfis tax law impact of perpetual and super maturity debt instruments profit participating loans convertible bonds mandatory convertible bonds contingent convertibles preference shares and warrant loans on hfis financial accounting treatment administrative guidance influence of the tfeu on member states approaches to classification of hfis interpretation of the parent subsidiary directive by the european court of justice applicability of the oecd model tax convention and implications of the oecd base erosion and profit shifting beps project throughout this book the analysis draws upon preparatory works case law and legal theory in english german and the scandinavian languages in conclusion the author considers tax policy issues and identifies and outlines possible high level solutions actual or potential users of hfis will greatly appreciate the clarity and insight offered here into the capacity and tax implications of hfis the book not only examines whether existing legislation is sufficient to handle the issues raised by international hfis but also provides an in depth analysis of the interaction between corporate financing and tax law in the light of today s financial innovation corporate executives and their counsel will find it indispensable in the international taxation landscape that is currently coming into view and academics and policymakers will hugely augment their understanding of a complex and constantly changing area of tax law

double taxation in europe a practical guide to obstacles and avoidance measures brings together a team of tax law experts to critically examine double taxation issues for corporations and individuals the book explains the main internationally recognised methods to avoid double taxation and features country focused chapters covering all european countries

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in todays world where it has become fairly easy for a taxpayer to move back and forth from one country to another it has become quite a common tax strategy especially among wealthy individuals and multinational companies to transfer their residence income and assets abroad mainly to reduce tax burden particularly in europe many wealthy individuals have moved their residence abroad mostly for tax purpose thus tennis legend bjorn borg who was known to have transferred decades ago his residence from sweden to monaco is obviously not alone a more recent well publicized case was grand departieu who showed his intention of leaving france after having acquired russian citizenship in 2013 this famous french actor and entrepreneur is reported to have made a comment that the french governments recent plan of raising the top marginal individual income tax rate is just like penalizing talented people who have achieved success in their careers

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