

“Practical International Tax Planning Strategies”

presented by

Picharn Sukparangsee

at

the Conference on

“Tax Planning & Tax Risk Management Toward AEC 2015”

arranged by

Ideal Forum Co., Ltd.

from 3 to 4 April 2014

at Pullman Bangkok G, Silom, Bangkok

Practical International Tax Planning

Philip J. Warner



Practical International Tax Planning:

Practical international tax planning M.J. Langer, 1985 Publication surveying all aspects of international tax planning including the effective use of foreign financial centres and tax havens Subjects deal with are the legal framework of international tax planning tax planning in the U S A and outside the U S A offshore bases outside the U S A fundamentals of international taxation import practice Other subjects are foreign investment in U S real estate and minimizing FIRPTA tax on dispositions of U S real estate offshore banks and trust companies foreign anti avoidance measures etc The book takes into account the impact of the 1986 Tax Reform Act as well as other changes resulting from new income tax treaties mutual assistance treaties and significant changes in the laws of other countries and other revisions *Practical International Tax Planning* Marshall J. Langer, 1999 **Langer on Practical International Tax Planning: Focus on tax planning** Denis A. Kleinfeld, Marshall J. Langer, Edward J. Smith, 2000 Examining more than 50 tax advantaged territories around the world PLI

s Langer on Practical International Tax Planning gives you the current knowledge and savvy advice you need to help clients capitalize on ripe tax havens and financial centers **Hungary in International Tax Planning** Dániel Deák, 2003 In depth survey of the Hungarian tax system from the perspective of domestic and international tax planning Detailed analysis of the principles of the taxation of resident corporations and foreign enterprises with and without permanent establishments The taxation of the income of individuals is reviewed in broad terms Compulsory social insurance contributions and related charges are discussed Registration duties local rates tax administration and anti avoidance measures are discussed in brief

Ireland in International Tax Planning Charles Haccius, 2004 Revised and updated edition providing the introduction to Irish tax legislation along with an explanation of the effect of treaty relief The discussion of treaties includes practical comparison with the OECD Model Convention and the effect on treaty relief of the Constitution of Ireland Follows practical discussion of Ireland s tax breaks beginning with a discussion of the circumstances in which a company resident or carrying on business in Ireland qualifies for the 12 5% rate of corporation tax and continuing with the issues of the tax efficient establishment and financing of a trading presence in Ireland whether through a subsidiary or a permanent establishment or both Possible tax planning opportunities are then discussed both long standing tax breaks such as relief for artists and inventors forestry bloodstock and foreign domiciliaries and opportunities such as those arising from the exercise of an employment in Ireland and the employment of crew members employed on ships or aircraft by an Irish resident company The book also discusses transfer pricing and anti avoidance provisions both in the Irish domestic tax legislation and in tax treaties

, **New U.S. Withholding Tax Rules: A Practical Guide** Charles Bruce, 2021-10-18 This book presents a simplified description of the IRS tax and reporting requirements with an emphasis on real world situations Examples and diagrams help the reader through the maze First the book introduces basic concepts and terms This discussion follows the order of the regulations and the reader is introduced to relevant terminology and acronyms Second it paints a relatively comprehensive

picture of a typical structure one with just a few bells and whistles and illustrates this with a simple diagram Then it proceeds to set forth a number of fact patterns by changing a few of the assumptions Next it describes how to comply with the rules in the context of the various fact patterns Third a handful of recommendations on compliance are made These are based on experience with the new rules Fourth Frequently Asked Questions FAQs are answered Features a Glossary at the end Copies of the important IRS regulations notices announcements forms instructions and publications are reproduced in the WORKPAPERS Published under the Transnational Publishers imprint

Tax Planning for International Mergers, Acquisitions, Joint Ventures and Restructurings Ansgar A. Simon, 2025-03-18 This classic handbook has once again been updated from cover to cover assuring its secure place as the preeminent tax practice guide for the most important types of cross border M taxable transactions tax free transactions both domestic and cross border loss and other tax attribute planning intellectual property transactions compensation arrangements acquisition financing joint ventures transfer pricing VAT and tax treaty usage Because it is crucial for management and counsel to develop a working knowledge of the salient aspects of the relevant law in a broad range of global jurisdictions the work is of immeasurable value in assessing strategizing and implementing international transactions while also allowing quick jurisdictional comparison of key tax aspects Addressing an important information gap in an area of widespread commercial concern this incomparable resource will be welcomed by international tax counsel corporate and financial services attorneys and corporate planning and compliance professionals

The Netherlands in International Tax Planning Johann Müller (podatki), 2007 This book provides international tax professionals with a practical guide on dealing with the Dutch taxation of business investments into the Netherlands via the Netherlands conduit structures or from the Netherlands The book focuses on corporate income tax dividend tax and capital duty as well as other issues typical of an international environment participation exemption the current state of the ruling practice financing The contents include introduction to Dutch domestic law including both corporate and personal income tax dividend withholding tax VAT real estate transfer tax an in depth analysis of the Dutch corporate income tax system including financing a taxpayer tax consolidation holding companies and participation exemption corporate reorganizations financing companies transfer pricing loss compensation inbound investments and anti abuse legislation participation exemption and Dutch interest limitation rules royalty and interest income box an overview of Dutch international law examining treaties the tax agreement for the Kingdom of the Netherlands the unilateral decree for the prevention of double taxation and EU law a description of Dutch dividend tax including EU entities and dividend tax credit an overview of the exchange of information including national law the ruling practice treaties and EU law a description of the personal income tax including 30% cost allowance and employee stock option plans

International Tax Michael Honiball, 2011-03-15 This book is not merely a new edition but a complete and significantly expanded rewrite It comprises over 900 pages of expert and in depth exposition of this complex subject that has become so important in the modern global

economy Already established over four previous editions as the pre eminent work on the subject it is a must own book for all students and practitioners of tax whether from a legal business or accounting perspective Professor Lynette Olivier and Michael Honiball are without peer in their understanding and clarity in this highly specialised field Five new chapters have been added on Taxation of individuals Taxation of Companies and Dividends Taxation of Partnerships Cross border VAT and Interpretation of Statutes *Fixing U.S. International Taxation* Daniel N. Shaviro, 2014-01-08 International tax rules which determine how countries tax cross border investment are increasingly important with the rise of globalization but the modern U S rules even more than those in most other countries are widely recognized as dysfunctional The existing debate over how to reform the U S tax rules is stuck in a sterile dialectic in which ostensibly the only permissible choices are worldwide or residence based taxation of U S companies with the allowance of foreign tax credits versus outright exemption of the companies foreign source income In *Fixing U S International Taxation* Daniel N Shaviro explains why neither of these solutions addresses the fundamental problem at hand and he proposes a new reformulation of the existing framework from first principles He shows that existing international tax policy frameworks are misguided insofar as they treat double taxation and double non taxation as the key issues conflate the distinct questions of what tax rate to impose on foreign source income and how to treat foreign taxes and use simplistic single bullet global welfare norms in lieu of a comprehensive analysis Drawing on tools that are familiar from public economics and trade policy but that have been under utilized in the international tax realm Shaviro offers a better analysis that not only reshapes our understanding of the underlying issues but might point the way to substantially improving the prevailing rules both in the U S and around the world **Luxembourg in International Tax Planning** Philip J. Warner, 2004 Study divided into five parts a short introduction to Luxembourg as a country and financial centre calculation of profits taxes and other taxes to which a fully taxable resident business is subject the fully taxable special purposes vehicles available in Luxembourg including banking and reinsurance tax exempt vehicles the 1929 holding company and investment funds and corporate reorganizations and examples of how Luxembourg could be used in international tax planning *Freedom Without Borders* Hoyt L. Barber, 2011-07-06 This intriguing book shows how to successfully expatriate one s funds assets and even oneself and one s family for safety profit privacy and an inexpensive better life The idea of moving to a new country has always been of interest to adventurous beings who relish the notion of basking in a beautiful place where one can live like a king for dimes on the dollar The dream is achievable but only if you first safely move your assets That is what *Freedom Without Borders* How to Invest Expatriate and Retire Overseas for Personal and Financial Success is all about Written for anyone seriously concerned about strategies for protecting assets as well as lifestyle this comprehensive guide covers everything one needs to know to do that successfully outside of the United States The book focuses on personal finance considerations for those contemplating moving or investing abroad rather than on culture aspects of such a decision It presents specific alternatives for finding and shifting assets to an ideal haven showing

readers how to protect personal wealth even as they discover a freer more peaceful way to live invest and or retire UK
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