



Model Tax Convention on Income and on Capital

CONDENSED VERSION

(as it read on 21 November 2017)



Model Tax Convention Income Capital V1

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Model Tax Convention on Income and on Capital 2017 (Full Version) OECD,2019-04-25 This publication is the tenth edition of the full version of the OECD Model Tax Convention on Income and on Capital This full version contains the full text of the Model Tax Convention as it read on 21 November 2017 including the Articles Commentaries non member economies positions **Model Tax Convention on Income and on Capital 2010 (Full Version)** OECD,2012-08-06 This publication is the eighth edition of the full version of the OECD Model Tax Convention on Income and on Capital This full version contains the full text of the Model Tax Convention on Income and on Capital as it read on 22 July 2010 **Germany**

Taxation Laws and Regulations Handbook Volume 1 Strategic Information and Corporate Taxation IBP USA,

Model Tax Convention on Income and on Capital 2014 (Full Version) OECD,2015-10-30 This publication is the ninth edition of the full version of the OECD Model Tax Convention on Income and on Capital This full version contains the full text of the Model Tax Convention on Income and on Capital as it read on 15 July 2014 European Tax Law, Volume 1 Peter J. Wattel,Otto Marres,Hein Vermeulen,Dennis Weber,2022-10-23 Ben Terra 1946 2019 was professor of tax law at the universities of Amsterdam UvA the Netherlands and Lund Sweden Peter Wattel is Advocate General in the Supreme Court of the Netherlands State Councillor extraordinary in the Netherlands Council of State and professor of EU tax law at the Amsterdam Centre for Tax Law ACTL University of Amsterdam Sjoerd Douma is professor at the ACTL Director of the Adv LLM programme in International Tax Law at Amsterdam Law School and partner at Lubbers Boer Douma in The Hague Otto Marres is professor at the ACTL and tax lawyer at Meijburg Co Amsterdam Hein Vermeulen is Director of PwC s EU Direct Tax Group Amsterdam Dennis Weber is professor of European Corporate Taxation at the ACTL and of counsel at Loyens Loeff The eighth edition of this leading textbook brings its comprehensive and systematic survey of European Tax Law up to March 2022 With its critical discussion of the EU tax rules and of the European Court s case law in tax matters it surpasses every other textbook on EU Tax Law in its clarification and analysis of the implications of the EU Treaties and secondary EU law for national and bilateral tax law The in depth coverage of Volume I includes the following 1 The far reaching consequences of the EU free movement rights the EU State aid prohibition the EU Charter of Fundamental Rights and the general principles of EU law for national tax law tax treaties national tax procedure State liability and relations with third States 2 Secondary EU law in force and proposed on direct taxes Parent Subsidiary Directive Tax Merger Directive Interest and Royalties Directive cross border tax dispute settlement instruments the Anti Tax Avoidance Directive and pending company tax proposals 3 Automatic exchange of information and other administrative assistance in the assessment and recovery of taxes between the EU Member States 4 Soft Law on Harmful Tax Competition Procedural matters and the extent of judicial protection are emphasized throughout this volume This new edition will continue to be of immense value to law school and university programmes in international tax law and in European Union law and for practice Volume II 2021 of this book

covers harmonization of indirect taxation energy taxation and capital duty as well as administrative cooperation in the field of indirect taxation **Falkland Islands Investment and Business Guide Volume 1 Strategic and Practical Information**
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doctrines as benefit theory neutrality theory and international equity comparative critique of the Organisation for Economic Co-operation and Development OECD and United Nations UN model tax treaties whether international law and customary principles mandate a strict territorial link with the source state for the assumption of tax jurisdiction whether the economic nexus based tax jurisdiction and absence of a physical presence breach the constitutional doctrine of extraterritoriality or due process and whether retrospective tax legislation breaches the principle of constitutional fairness. The book offers a politically informed analysis of the nexus principle and balances the dynamics of physical presence and economic nexus standards based on an in-depth survey of the historical evolution of judicial pronouncements and international practices in this regard. Dr Singh's book exposes an urgently needed missing link in the international source rule literature and takes a giant step towards solving the thorny question of appropriate tax apportionment. It sheds brilliant light on the policies states may adopt when signing new tax treaties so that unintended results may be foreseen and avoided. Tax practitioners, taxation authorities and academic researchers in the field of international tax law and policy will greatly appreciate the book's forthright enhancement of the ability to defend challenges based on the nexus doctrine.

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