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and on Capital produced in a loose leaf format to accommodate yearly updates This fifth edition contains the full text of the Model Tax Convention as it read on 28 January 2003 but without the historical notes *Model Tax Convention on Income and Capital* ,1992 **Model Tax Convention on Income and on Capital** ,2004 **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 **Model Tax Convention on Income and on Capital: Condensed Version 2000** OECD,2000-08-28 This 2000 edition of the Model Tax Convention Condensed Version has been superceded by more recent editions This publication is the condensed version of the OECD Model Tax Convention on Income and on Capital which is produced in a loose leaf *Model Tax Convention on Income and on Capital: Condensed Version 2005* OECD,2005-11-18 This update of the Condensed Version of the OECD Model Tax Convention contains the full text of the Articles Commentaries and Country Positions as they read on 15 July 2005 but without the historical notes background reports and list of conventions Model Tax Convention on Income and on Capital: Condensed Version 2008 OECD,2008-08-31 This Condensed Version of the OECD Model Tax Convention contains the articles and commentaries of the Model Tax Convention as it read on 17 July 2008 **Model Tax Convention on Income and on Capital: Condensed Version September 1992** OECD,1992-10-19 Condensed version of the loose leaf publication Model tax convention on income and capital containing the full text of the September 1992 Model Tax Convention but omitting the historical notes and annexes which include a detailed list of tax conventions between OECD member countries and the text of the Recommendation of 23 July 1992 from the OECD Council **Model Tax Convention on Income and on Capital: Condensed Version 2014** OECD,2014-08-20 The OECD Model Tax Convention provides the basis for the negotiation and interpretation of more than 3000 tax treaties that make up a network that co ordinate the income and corporate tax systems of most countries with the objective of removing tax barriers to cross border trade and investment Model Tax Convention on Income and on Capital: Condensed Version 1998 OECD,1998-08-05 This 1998 edition of the Model Tax Convention Condensed Version has been superceded by more recent editions This publication is the third edition of the condensed version of another OECD publication entitled Model Tax Convention on Income and on Model Tax Convention on Income and on Capital ,2003 *Introduction, Model Convention, Commentary, Non-member Countries' Positions* ,2006 *The OECD's Global Minimum Tax and its Implementation in the EU – A Legal Analysis of Pillar Two in the Light of Tax Treaty and EU Law* Valentin Bendlinger,2023-10-17 Rarely in the history of international tax law have there been so many evolutions in such a short space of time In a dizzying array of reports work programmes consultations and announcements the OECD with the active support of the EU has created a framework for a global minimum tax Pillar Two or GloBE In the meanwhile jurisdictions are faced with the practical difficulties of incorporating an incredibly complex set of rules into their domestic

legal systems This book aims to shed light on the fundamental and technical issues surrounding the global minimum tax It seeks to unravel the complex ramifications of GloBE s technical framework and aims to explore the relationship between the OECD s soft law materials including the OECD s GloBE Model Rules and the GloBE Commentary tax treaties and the EU s recently adopted GloBE Directive The author not only analyses Pillar Two from a technical and a policy perspective but also provides for a comprehensive examination of the compatibility of Pillar Two with tax treaties and EU law To this end the analysis also includes practical examples and illustrates solutions to numerous technical and policy issues of Pillar Two Among the seminal matters covered are the following History and Background of the global minimum tax discussion Detailed technical considerations on the design of Pillar Two including its scope the determination of both the GloBE Income as well as the Adjusted Covered Taxes and the computation of the effective tax rate as well as the computation and collection of the final Top up Tax liability including the application of the QDMTT IIR and UTPR Tax policy implications and deficiencies of the final design of Pillar Two The relation of Pillar Two to the current distribution of taxing rights under bilateral tax treaties The analysis includes the compatibility of the QDMTT IIR and UTPR with existing tax treaties and the resolution of potential normative conflicts both between tax treaties and domestic implementations of Pillar Two as well as between tax treaties concluded by EU Member States and the EU s GloBE Directive The role of the GloBE Directive within the EU s legal order including the issue of EU internal and external competence as well as the substantive compatibility of Pillar Two with primary law such as the fundamental freedoms Detailed comparisons between the OECD s GloBE Model Rules and the EU s GloBE Directive elucidate common points and deviations In addition to comprehensive technical considerations the book also provides a comprehensive tax policy perspective on the global minimum tax For its unparalleled clarification of the issues alone this book will prove invaluable to practitioners tax authorities policymakers and academics concerned with the implementation and application of Pillar Two Valentin Bendlinger s book is an outstandingly remarkable work on a highly complex topic The structure clarity of thinking and legal argumentation are excellent and the legal and policy results throughout are profoundly argued The book successfully ties together broad concepts of international and European tax law with highly complex and novel issues of the taxation of multinational enterprises It should be highlighted that Valentin Bendlinger succeeded in leading the reader from the history and policy through a jungle of unprecedented rules to overarching fundamental issues of how the new taxation framework is to be placed in the international and European legal order Prof DDr Georg Kofler LL.M. NYU Vienna University of Economics and Business

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