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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: –

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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.

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

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investments and finally suggests the development of an International Mining Investment Law.

The Revenue Statistics in Latin America and the Caribbean publication compiles comparable tax revenue statistics for a number of Latin American and Caribbean economies. The model is the OECD Revenue Statistics database, backed by a well-established OECD methodology.

This publication compiles comparable tax revenue statistics for Indonesia, Japan, Kazakhstan, Korea, Malaysia, the Philippines and Singapore.

Cruise ship passengers and all-inclusive hotel-guests are increasing exponentially as these floating and fixed properties proliferate in size and number. This is especially true for developing economies that consider sun, sand and sea tourism as a form of growth. Tightly integrated, multi-billion dollar global enterprises mix with weak local institutions populated by local officials, some corrupt, vying for more investment to create a toxic cocktail with diminished social benefits as the hangover. Within view of the shoreline and the towering monoliths of hotels and ships, post-secondary education facilities teach normative concepts of good management to students who, upon graduation, fight for a decreasing number of poorly paid jobs. Meanwhile, local government officials tout vacuous GDP figures and hospitality companies make inflated claims of employment to garner federal funding for infrastructure expansion. Many observers have made similar claims that have been easily ignored to date

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due to an absence of studies integrating tax revenue, private and public finance, and social outcomes. This combination illustrates not only current structures, but also how they are engendered. Rather than relying on tourist satisfaction, much investment is driven by windfall profits and tax-loss carryforwards thanks to tax loopholes and willing local officials that ignore or aid in the violation of regulations. While foreign companies condemn the corruption and cronyism at destinations, local nationals decry the exploitative foreign companies. The simple truth is that they flourish symbiotically. As such, this book necessarily addresses both actors. However, rather than being simply critical or numerical, this book provides recommendations for multinational enterprises increasingly running the risk of detection of aggressive tax planning and greenwashing. For host countries, it provides recommendations of a virtuous cycle for improved public sector accountability to restore the beneficial effects of tourism. There is also a discussion on how a value-added study of the tourism industry within a jurisdiction could detect untaxed profits that are withheld through astute transfer-pricing schemes. This is a book for tourism managers and experts, as well as policy-makers in the Caribbean and any sun, sand and sea destination that attracts floating and fixed all-inclusives.

Tax Guide 2015 provides comprehensive coverage of all areas of taxation applicable to Ireland. Written in non-technical language by an expert team of tax practitioners, it covers: Income Tax; Capital Gains Tax; Value Added Tax; Employers' PAYE/PRSI; Corporation Tax; Capital Acquisitions Tax; Stamp Duties; Vehicle Registration Tax and Customs and Excise. As well as taking on board the provisions of the latest Finance Act it features detailed worked

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examples and extensive references to recent case law. It also contains a set of tables giving speedy access to allowances, tax rates, compliance deadlines and other invaluable information. Tax Guide 2015 is an ideal reference book that serves as a self-contained textbook and as a pointer to more detailed Bloomsbury Professional publications, such as Irish Income Tax, The Taxation of Companies, Irish Stamp Duty Law and Capital Acquisitions Tax. Previous edition ISBN: 9781780434612

Seventeen in a series of annual reports comparing business regulation in 190 economies, Doing Business 2020 measures aspects of regulation affecting 10 areas of everyday business activity.

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