



# The End of Tax Incentives: What will a global minimum tax mean for developing countries?

Alexandra Readhead  
June 2021

# Tax Incentives In Developing Countries And International Taxation

**James R. Hines**



## **Tax Incentives In Developing Countries And International Taxation:**

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**Taxation and Multinational Activity** James R. Hines,2009-02-15 Because the actions of multinational corporations have a clear and direct effect on the flow of capital throughout the world how and why these firms behave the way they do is a major issue for national governments and their policymakers With an unprecedented ability to adjust the scale character and location of their global operations international corporations have become increasingly sensitive to the kind and degree of tax obligations imposed on them by both host and home countries Tax rules affect the volume of foreign direct investment corporate borrowing transfer pricing dividend and royalty payments and research and development National governments that tax the profits of international firms face important challenges in designing tax policies to attract them This collection examines the global ramifications of tax policies offering up to date theoretically innovative and empirically sound perspectives on a problem of immense significance to future economic growth around the globe *Tax Incentives for*

*Private Investment in Developing Countries* Robert Anthoine,2013-06-29 The purpose of this book is to provide within a single volume a comparative analysis of the tax laws of developed countries bearing upon direct private investment in developing countries and a representative sample of developing country laws bearing upon the receipt of such investment This study was initiated by the Tax Committee of the Business Section of the International Bar Association under the leadership of Jean Claude Goldsmith of the Paris Bar I undertook to act as the reporter to browbeat colleagues in other countries to write national reports and to provide the reporter s overview statement This report includes studies of fourteen developed countries prepared by national reporters and summaries of five other developed country laws Note worthy are the detailed examinations of the laws of the Federal Republic of Germany and of Japan the two developed countries that have

provided the most comprehensive system of incentives for private investment in developing countries Also contained herein are reports from eight developing countries including a thorough examination of the laws of Brazil Attention is paid in the developed country reports not only to those tax provisions that act as an inducement to foreign investment but also to those that favor domestic investment and hence act as a disincentive to foreign investment Relevant double taxation agreements are discussed and other aspects such as exchange control and government grants are also mentioned

***Principles of International Taxation*** Lynne Oats,2021-09-30 The book provides a clear introduction to international taxation and presents its material in a global context explaining policy legal issues and planning points central to taxation issues primarily from the viewpoint of a multinational group of companies It uses examples and diagrams throughout to aid the reader's understanding and offers more in depth material on many important areas of the subject Traditionally published every 2 years in both print and digital formats this content is a core requirement for student reading lists at both undergraduate and post graduate level Fully updated to cover all new tax legislation and developments in light of the OECD BEPS project implementation key areas to be included in this new edition are changes proposed by BEPS 2.0 in relation to taxation and the digital economy including Pillar Two and the proposed new UN Model Article 12B further progress on the implementation of OECD Base Erosion and Profit Shifting implementation including an update on the implementation of BEPS recommendations including artificial avoidance of permanent establishment status and prevention of treaty abuse the implementation of transfer pricing documentation and country by country reporting multilateral instrument implementation the impact of Covid 19 on international taxation further developments in European direct taxation including the transparency package directives on anti tax avoidance and the common corporate tax base and state aid cases Apple in particular and updates to the Directive on Administrative Cooperation and the new communication on Business Taxation for the 21st Century Proposals in relation to the taxation of digital business in particular the OECD's unified approach and the UN modifications to the Model Double Taxation Convention Proposals for a global minimum corporate tax rate to curb base erosion and tax competition

**Tax Incentives for Foreign Direct Investment** A. J. Easson,2004-01-01 Each national report addresses among other things the following issues the sources of law and general principle of the law of evidence the means of evidence the role of the judge and the parties in the evidence procedure the evaluation of evidence the production of evidence the registration of produced evidence the possibilities to admit new evidence or to renew evidence in appeal proceedings

**Tax Policy for Developing Countries** Mr.Vito Tanzi,Mr.Howell H. Zee,2001-01-01 Discusses important tax policy issues facing developing countries today provides a review of the role of tax incentives and identifies some policy challenges posed by the globalization of the world economy Draws on country cases

**Taxation, International Cooperation and the 2030 Sustainable Development Agenda** Irma Johanna Mosquera Valderrama,Dries Lesage,Wouter Lips,2021-03-29 This open access volume addresses the link between international taxation the 2030 Sustainable Development Agenda and the medium term revenue

strategy concept It also analyses how countries and governments can reinforce this link in current and future initiatives in international taxation including the base erosion profit shifting project initiated by the Organization for Economic Co operation and Development with the political mandate of the G20 It discusses the 2030 Sustainable Development Agenda that are relevant for taxation and assesses the current work done by international organizations regional tax organizations and countries to achieve these Sustainable Development Goals The contributions to this volume provide an interdisciplinary mix of expertise in tax law international political economy global governance and international relations Through these different perspectives this volume provides an elaborate reference and evaluation framework for multilateral cooperation on tax and development to strengthen the revenue system of developed and developing countries This topical volume is of interest to students and researchers of the social sciences law and economics as well as policy makers working on taxation

**The Cambridge Companion to Business and Human Rights Law** Ilias Bantekas, Michael Ashley Stein, 2021-09-09 An innovative textbook setting out a systematic approach to business and human rights Beneficial Ownership in International Taxation Kuźniacki, Błażej, 2022-08-12 This authoritative book provides a structural global view of evolving judicial and doctrinal trends in the understanding of beneficial ownership in international taxation B a ej Ku niacki presents a route towards an international autonomous meaning of beneficial ownership while also offering a comprehensive explanation of the divergent understandings and tax policy arguments underpinning its continuing ambiguity **Tax Policy in Developing Countries** Javad Khalilzadeh-Shirazi, Anwar Shah, 1991-01-01 World Bank Technical Paper No 140 Also available Volume 1 ISBN 0 8213 1843 8 Stock No 11843 Volume 3 ISBN 0 8213 1845 4 Stock No 11845 Provides state of the art guidance and information on the procedural requirements and practical aspects of environmental assessment in various sector and location specific contexts Three volumes also available in Arabic Volume 1 ISBN 0 8213 3523 5 Stock No 13523 Volume 2 ISBN 0 8213 3617 7 Stock No 13617 Volume 3 ISBN 0 8213 3618 5 Stock No 13618 **WTO and Direct Taxation** Michael Lang, Judith Herdin, Ines Hofbauer, 2005-01-01 WTO Law and Direct Taxation are linked in numerous ways The WTO Agreements thereof especially the GATT and GATS Agreements contain several explicit provisions on the subject of direct taxes or even on its delimitation from Tax Treaty Law To some extent the scope of application of WTO Law has been broadened by case law to comprise also direct taxes This entails overlappings particularly with regard to the law of subsidies prohibitions of discrimination and most favoured nation obligations This book highlights increasingly relevant interdependencies between WTO Law and Direct Taxation from the viewpoint of 21 States Special emphasis is placed on the conformity of national taxes on profits with WTO Law as well as on specifics of interpretation in several Member States 21 National Reports from nearly all EU countries as well as Colombia Israel New Zealand Norway and the USA dealt with this topic and were compiled and published in this volume Additionally a General Report prepared by Servatius van Thiel summarises the results of the National Reports Moreover experts in this field joining the Conference among them Reuven Avi

Yonah Michael Lennard and Raymond Luja have volunteered contributions dealing with specific problems of WTO and Direct Taxation

*Bibliography on Law and Developing Countries* Brian Z. Tamanaha, 2023-11-27 The citations listed in this bibliography were published between 1975 and mid 1993 Substantial legal developments have occurred since 1975 and the vast bulk of materials on the subject has been produced since that time The citations are grouped under 53 different subject headings Some subjects are further divided into subcategories Audience Lawyers legal scholars social scientists and civil servants involved in development issues

**Essays in International Taxation, 1976** United States. Department of the Treasury, 1977 The essays analyse the interactions between tax law and tax policy The analyses evaluate changes which presuppose the foreign tax credit mechanism the separate taxation of corporations and their shareholders and other basic elements in US taxation of foreign income

*The New Palgrave Dictionary of Economics*, 2016-05-18 The award winning *The New Palgrave Dictionary of Economics* 2nd edition is now available as a dynamic online resource Consisting of over 1 900 articles written by leading figures in the field including Nobel prize winners this is the definitive scholarly reference work for a new generation of economists Regularly updated This product is a subscription based product

**International Taxation of Manufacturing and Distribution** John Abrahamson, 2016-02-18 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 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

**Research Handbook on International Taxation** Yariv Brauner, 2020-12-25 Capturing the core challenges faced by the international tax regime this timely Research Handbook assesses the impacts of these challenges on a range of stakeholders evaluating various paths to reform at a time when

international tax policy is a topic high on politicians agendas      **Proceedings of the 2023 Brawijaya International Conference (BIC 2023)** Yusfan Adeputera Yusran, Dini Kurnia Irmawati, Rizki Prafitri, Muhammad Pramujo, 2024-10-28 This is an open access book We proudly present the 2023 Brawijaya International Conference BIC 2023 as the consecutive series of conferences that is organised and hosted annually by Universitas Brawijaya Indonesia The BIC 2023 will be held in Lombok Indonesia on October 19-21 2023 The conference committee consists of multi department of Universitas Brawijaya The BIC 2023 will present multidisciplinary research findings related to sustainable development goals The BIC 2023 will be a great opportunity for exchanging ideas and knowledge in all multidisciplinary areas for academicians scientists practitioners and global executives The event will facilitate a focus group discussion and consultation for the participants especially stakeholders to address the current issues and challenges including the future invention and innovation within multidisciplinary areas The BIC 2023 invites fellow researchers scientists students practitioners global executives from multidisciplinary areas to participate and gather in this event to share and discuss the related research result and finding from all multidisciplinary areas You should not miss the great opportunity to establish partnership and acquire tremendous knowledge within the BIC 2023

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