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Canadian Tax Principles 2012 2013 Study Guide

H Kauffman

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Jurisdiction to Tax Corporate Income Pursuant to the Presumptive Benefit Principle Eva Escrivano, 2019-05-10

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rights among States This PhD thesis obtained the prestigious European Academic Tax Thesis Award 2018 granted by the European Commission and the European Association of Tax Law Professors What s in this book This book provides a disruptive discourse on tax sovereignty in the field of corporate income taxation that endeavors to escape from long standing tax policy tendencies and prejudices while considering the challenges posed by a globalized and increasingly digitalized economy In particular the book offers an innovative perspective on certain deep rooted paradigms historically underlying corporate income taxation tax treatment of related parties within a corporate group along with the arm s length standard corporate tax residence standards and definition of source for corporate income tax purposes with a particular emphasis on the permanent establishment concept The book explores their respective origins supposed tax policy rationales structural problems and interactions ultimately showing how the way tax jurisdiction is currently defined through them inherently tends to trigger profit shifting outcomes In view of the conclusions of the study the author suggests the use of a new version of the traditional benefit principle the presumptive benefit principle that would contribute to address the profit shifting phenomenon while serving as a practical guideline to achieve a more equitable allocation of taxing rights among jurisdictions Finally the book submits a number of proposals inspired by the aforementioned guideline that aspire to strike a balance between equity effectiveness and technical feasibility They include a new corporate tax residence test and most notably a proposal on a new remote sales permanent establishment How this will help you With its case study based on the Apple group empirically demonstrating the existence of the profit shifting phenomenon its clearly documented exposure of the reasons why traditional corporate income tax regimes systematically give rise to these outcomes its new tax policy guideline and its proposals for reform this book makes a significant contribution to current tax policy discussions concerning corporate income taxation in cross border scenarios It will be warmly welcomed by all concerned policymakers scholars practitioners with the greatest tax policy challenges that corporate income taxation is facing in the contemporary world

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In an electronic era where connections and knowledge reign supreme, the enchanting power of language has become more apparent than ever. Its capability to stir emotions, provoke thought, and instigate transformation is really remarkable. This extraordinary book, aptly titled "**Canadian Tax Principles 2012 2013 Study Guide**," compiled by a highly acclaimed author, immerses readers in a captivating exploration of the significance of language and its profound affect our existence. Throughout this critique, we will delve in to the book is central themes, evaluate its unique writing style, and assess its overall influence on its readership.

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