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Table Of Contents. Chapter 1 Introduction to Taxation Chapter 2 Introduction to International

Taxation Chapter 3 The Right to Tax Individuals Chapter 4 The Right to Tax Companies Chapter 5 The Double Tax Problem Chapter 6 Double Tax Relief in Practice Chapter 7 Double Tax Treaties Chapter 8 Internationally Mobile Employees Chapter 9 Permanent Establishments Chapter 10 Taxation of Cross-border ...

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taxes; may include sales between companies in different countries; individuals travel from one country to the other for business or any other purpose; generation of income in one country as a result of investments made by individuals or corporations of another country; or services rendered by residents of one country to persons in another country etc ...

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3.3.1.3 Taxation of income from “direct”

investment Non-residents can engage in direct investment in New Zealand either through a branch (that is, an unincorporated “fixed establishment”), or a subsidiary (that is, an incorporated “fixed establishment”). 3.3.1.3.1

Branch investment

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Introduction A significant role of a double tax agreement (DTA) between two or more countries is to remove the double taxation (discussed in chapter 2), which is an impediment to cross-border trade in goods and services, and the move-ment of capital and people between countries. Many countries have now

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Chapter 3 Taxation Of International

This chapter explains the implications for the taxation of non-residents flowing from the above

decisions. The two most important sources of income earned by non-residents are debt (money that foreigners lend to New Zealand firms) and equity (direct investment in New Zealand firms). Taxes on non-residents raise significant amounts of revenue.

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Taxation (International and Other Provisions) Act 2010

This chapter reviews first the key developments of international business and the development of the multinational enterprise and then discusses some of the developments related to the systems for international taxation that arose to address this cross border trading growth.

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