

Federal Taxation 2014 Solution Manual

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full syllabus coverage of service tax central excise customs vat and cst use of simple language with a clear examination focus recent amendments made by finance act 2014 highlighted recent circulars notifications and case laws examples and solved illustrations for crystallization of concepts use of tables and flowcharts for easy understanding of concepts student friendly presentation for effective learning chapter overview at the beginning of each chapter self examination questions at the end of each chapter short revision notes for quick revision at the end of each chapter

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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

financial innovation allows companies and other entities that wish to raise capital to choose from a myriad of possible instruments that can be tailored to meet the specific business needs of the issuer and investor however such instruments put increasing pressure on a question that is fundamental to the tax and financial systems of a country the distinction between debt and equity focusing on hybrid financial instruments hfis which lie somewhere along the debt equity continuum but where exactly depends on the terms of the instrument as well as on applicable laws this book analyses their treatment under both domestic law and tax treaties key jurisdictions including the eu some of its member states and the united states are covered advocating for a broader scope of application of hfis as part of the financing of companies in europe alongside traditional sources of debt and equity financing the book addresses such issues and topics as the following problems associated with the debt equity distinction in international tax law cross border tax arbitrage and linking rules drivers behind the use and design of hfis tax law impact of perpetual and super maturity debt instruments profit participating loans convertible bonds mandatory convertible bonds contingent convertibles preference shares and warrant loans on hfis financial accounting treatment administrative guidance influence of the tfeu on member states approaches to classification of hfis interpretation of the parent subsidiary directive by the european court of justice applicability of the oecd model tax convention and implications of the oecd base erosion and profit shifting beps project throughout this book the analysis draws upon preparatory works case law and legal theory in english german and the scandinavian languages in conclusion the author considers tax policy issues and identifies and outlines possible high level solutions actual or potential users of hfis will greatly appreciate the clarity and insight offered here into the capacity and tax implications of hfis the book not only examines whether existing legislation is sufficient to handle the issues raised by international hfis but also provides an in depth analysis of the interaction between corporate financing and tax law in the light of today s financial innovation corporate executives and their counsel will find it indispensable in the international taxation landscape that is currently coming into view and academics and policymakers will hugely augment their understanding of a complex

and constantly changing area of tax law

tax treaty law and eu tax law in connection with hybrid entities hybrid entities have traditionally been used as an avenue for international tax planning and extending benefits under tax treaties to such entities has been a source of controversy for many years now although the oecd partnership report provided solid policy footing on this issue there was still no common legal basis that countries could rely on for such positions the increasing focus of countries towards the curbing of tax avoidance and abuse involving hybrid mismatch arrangements culminated in a specific action plan in the beps project being dedicated to the design of domestic rules and the development of treaty provisions that would neutralize the tax effects of such arrangements this volume provides an in depth analysis of various aspects of this topic it is divided into two parts the first dealing exclusively with tax treaty issues arising in connection with hybrid entities and the second dealing with eu tax law issues surrounding hybrid entities the former part comprises chapters analysing how tax treaties have historically dealt with this issue with a focus on domestic court jurisprudence the positions in the oecd and the un model conventions the developments that have come about owing to the beps project and the impact of several existing measures regimes and vehicles on these tax treaty provisions the latter part comprises chapters on how hybrid entities are dealt with under primary eu law under various secondary law directives including the newly enacted anti tax avoidance directives and an analysis of policy solutions offered in this direction

environmental performance review bulgaria

bachelor thesis from the year 2016 in the subject law tax fiscal law grade 1 1 language english abstract over the last few years the sharing economy has grown substantially with new high profile businesses emerging especially airbnb became an integral part of the accommodation industry and disrupted traditional hotel and bed and breakfast businesses however at present airbnb has to face many controversies due to consumer safety regulatory and tax evasion issues as regulators and legislators established laws and regulations with the traditional economy in mind they are not suited for the sharing economy and application often remains uncertain especially in the area of taxation consequently the difficulty of establishing an effective regulatory framework for the sharing economy is receiving considerable attention currently therefore this thesis aims to identify some of the challenges that will be of concern to regulators when developing a regulatory framework and outlines some guiding principles for regulating airbnb finally this thesis finds that a self regulatory approach could be the most effective solution to encounter the difficulties and controversy

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