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Global Forum on Transparency and Exchange of Information for Tax

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Permanent Establishments Ekkehart Reimer, Stefan Schmid, Marianne Orell, 2018-06-07 Permanent Establishments PEs are a key facet of international taxation They constitute the crucial threshold for the assignment of taxing rights to a jurisdiction in all cases of enterprises operating in more than one country The issue of whether there is a PE and how much profit should be allocated to it is an increasingly important factor in tax planning tax accounting tax compliance and related tax risk management Groundbreaking developments have reshaped the face of the classical PE concept during the year 2017 Following action item no 7 of the Anti BEPS efforts of G20 and OECD the OECD has presented the Multilateral Instrument MLI on Base Erosion and Profit Shifting in June 2017 Based on the MLI as well as earlier drafts Article 5 of the OECD Model Tax Convention and the Official Commentary have been amended in November 2017 Similarly Article 7 of the OECD Model Tax Convention on the allocation of income in PE situations is influenced by the October 2015 OECD BEPS proposals This academically rigorous yet thoroughly practical work provides comprehensive guidance on a variety of complex PE issues Its initial chapters analyse the latest OECD and EU developments in the context of Articles 5 and 7 of the OECD Model Tax Convention 21 country chapters cover domestic PE issues as well as country specific treaty developments from a practical perspective Contributors Fabrizio Acerbis Maret Ansperi Yumiko Arai kos Burj n Anna Berglund Peter Collins Mike Cooper David Cuellar Veronika Daurer Frank Feng Mikhail Filinov Sandra Fleurier Jose Antonio Gonzalez Herbert Greinecker S ren Jesper Hansen Lars Elleg rd Holst Mauricio Hurtado Martin Jann Renaud Jouffroy David Lerner Peter Lindblad Iren Lipre Jessica Ma Anna Mallol Dennis Matthijs Hamish McElwee Kunal Mehta Osman Mollagee Matthew Mui Ram n Mullerat Luis

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Nayak, Shubham Khaitan, 2020-05-28 The purpose of this book is to enable the taxable person to understand the applicability and impact of GST provisions with respect to the Textile Industry. The comprehensive and in-depth practical knowledge of the three authors would help in the implementation of the provisions in an easy manner. This book is divided into eight parts as follows: Part 1 Introduction and Overview; Part 2 GST impact analysis on relevant sectors: Manufacturers and Traders, Service Providers, Job workers and other supplies; Part 3 Conceptual law containing classification, ITC, valuation, place of supply, reverse charge and transitional provisions; Part 4 Procedural law containing registration, payment, returns, refunds, assessment, audit, advance ruling, appeals, penalties, demands, etc.; Part 5 Import and export containing SEZ supplies and FTP incentives; Part 6 Disputes, mitigation and department actions focussing on prevention of possible disputes, their resolution; Part 7 Tax planning and professional services; Part 8 Miscellaneous containing FAQs and filled forms. *A Selection of ... Internal*

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