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Conducting Business Abroad? International Tax Attorney ...

In brief, the single tax principle states that income from cross-border transactions should be subject to tax once (that is, not more but also not less than once), at the rate determined by the benefits principle. The benefits principle allocates the right to tax active business income primarily to the source jurisdiction and the

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cross-border tax arbitrage through the use of hybrid financial instruments. The effect of the provision is that debt between group companies is reclassified as equity, and thus interest into dividends. The article examines the requirements for applying Sec. 2B of the Danish

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Explores tax arbitrage opportunities ensuing from financial engineering techniques with cross-border financial instruments, making use of complex types of arrangements such as hybrids, synthetics, and non-traditional financial instruments, which are

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12 See, e.g., Kevin A. Bell, IRS Official Addresses Cross-Border Arbitrage Policy, LEXIS 2002 TNT 59–6 (noting that Matthew Stevens, Special Counsel to the IRS Chief Counsel, observed in an unofficial capacity that “in a macro sense [cross-border tax arbitrage] is not a good thing”); Zelaya-Quesada, supra note 10, at G-8 (describing belief that “tax arbitrage creates double nontaxation ...

Cross-border investing with tax arbitrage: The case of ...

There are three levels of tax impact on cross-border transactions, as follows: (i) Source or host country, i.e. taxes payable on the income earned through overseas subsidiaries or branches, and the withholding tax on the payments made by them;

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A main goal of the reform is to effectively reduce aggressive tax avoidance opportunities through cross-border dividend arbitrage. These transactions, known as “cum-cum-deals,” have received heightened scrutiny in Germany following a highly-publicized media investigation that concluded that the scheme costs the German treasury millions of Euros in lost tax revenue.

Jakob Bundgaard* Cross-Border Tax Arbitrage Using Inbound ...

The existence of the credit creates opportunities for cross-border tax arbitrage - in which foreign holders of German stock transfer the dividend to German shareholders - and implies that it is tax efficient for foreign investors to hold derivatives rather than investing directly in German stocks.

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TALK TAX: Does Cross-Border Tax Arbitrage warrants an ...

Earlier versions of this article were titled “Dividend Tax Credits, the ex-day, and Cross-Border Tax Arbitrage: the Case of Germany.” I am grateful to Emre Karaoglu for excellent research assistance, Vijay Karnani for help with data collection, Glenn Hubbard, Ravi Jagannathan, Debbie Lucas, Mitch Petersen, Josef Zechner, Thomas Eckhardt (Ernst and Young), two anonymous referees, and ...

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China is getting tough on the price-arbitrage trend of daigou sales and has introduced a new cross-border tax policy that aims to claw back some lost revenue earnings. At the beginning of April the Chinese government introduced a new import tax rule for cross-border purchases.

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China's new tax policy means tougher trading for cross ...
Cross-border tax arbitrage is generally used to qualify transactions, which exploit differences in the tax systems of two (or more) countries. The subject is very current, not only due to the increasing international tax planning through complex transactions undertaken by multinational companies but also by the recent national reactions to the problem (e.g.

ONE NATION AMONG MANY: POLICY IMPLICATIONS OF CROSS-BORDER ...
What is tax arbitrage? In the context of cross-border finance, the term arbitrage is used to describe the exploitation by multinational groups of asymmetries between different tax regimes (tax...

International Tax Planning
It poses a series of questions about the phenomenon known as "international tax arbitrage" — taking advantage of differences in domestic tax laws to achieve special benefits for cross-border transactions. Among the questions posed are whether arbitrage presents a legitimate issue of tax policy, what that issue is, and what can be done about it.

Tax Competition, Tax Arbitrage, and the Internation Tax Regime
In its simplest terms, cross-border tax arbitrage refers to a situation in which a taxpayer or taxpayers rely on conflicts or differences between two countries' tax rules to structure a transaction or entity with the goal of obtaining tax benefits (for example, reduced or no taxation) overall.

German lawmakers weigh proposal to curb tax avoidance ...
International or cross-border tax arbitrage is the name frequently given to arrangements designed to produce tax savings through exploitation of differences between the U.S. and foreign tax rules on such matters as determining the source of income and deductions, classification of entities and determining the residents of entities for tax purposes.