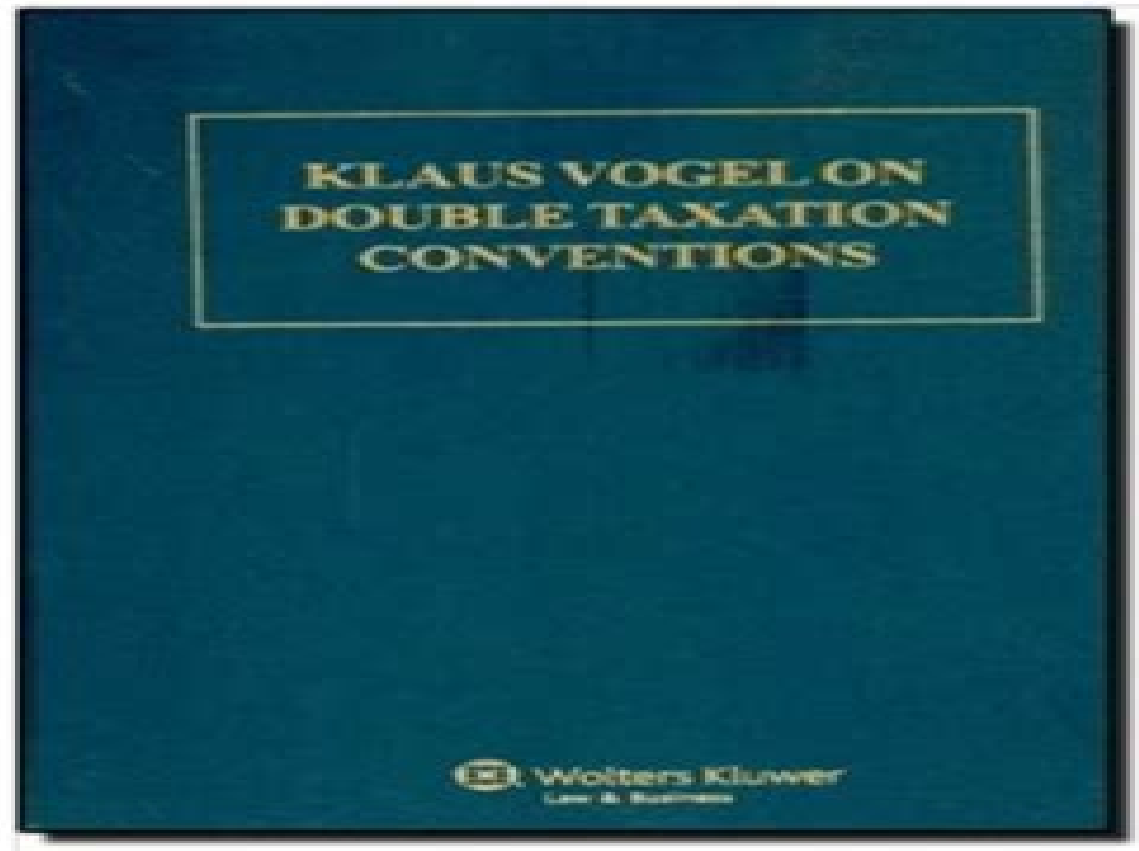


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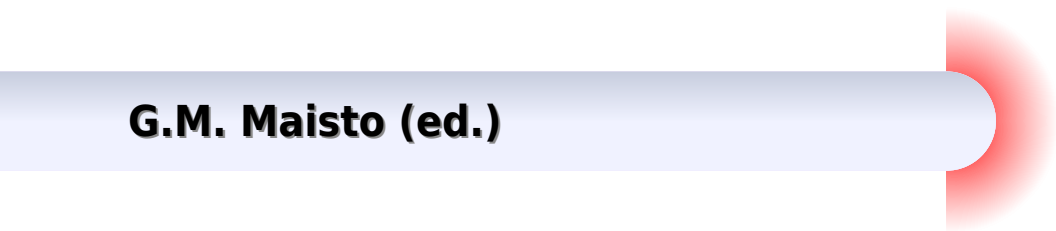
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Klaus Vogel On Double Taxation Conventions Third Edition

G.M. Maisto (ed.)



Klaus Vogel On Double Taxation Conventions Third Edition:

Klaus Vogel on Double Taxation Conventions Klaus Vogel, 1997 Full Title Klaus Vogel on Double Taxation Conventions Third Edition A Commentary to the OECD UN and U S Model Conventions for the Avoidance of Double Taxation of Income and Capital With Particular Reference to German Treaty Practice A Commentary to the OECD UN and U S Model Conventions for the Avoidance of Double Taxation of Income and Capital With Particular Reference to German Treaty Practice Double taxation conventions DTCs raise a plethora of interpretational questions for the practitioner and student of tax law This book provides the answers An encyclopedic treatise on DTCs Klaus Vogel on Double Taxation Conventions is a guide to all legal issues DTCs raise and includes information on worldwide case law and commentators views The OECD Model Convention serves as the organisational basis for this work Each chapter focuses on one article of the Convention and provides the wording of the article and that of the respective articles of the UN and US Models the official Commentary by OECD and an extensive discussion by the authors of the legal problems involved In addition Klaus Vogel on Double Taxation Conventions offers an account of all German tax treaties how they differ from the model provisions and the potential practical impact of such differences The first two editions have been used by lawyers tax advisers and scholars all over the world Courts in Canada Germany South Africa and the Netherlands have cited them as authority This revised edition includes the most recent OECD Model revisions and all recent case law and relevant literature The authors have rethought many of the problems discussed further improved their argument and amended their views where they have been convinced by opponents

Klaus Vogel on Double Taxation Conventions Klaus Vogel, 1997 [Klaus Vogel on Double Taxation Conventions](#) Ekkehart Reimert, Alexander Rust, 2022-01-18 Klaus Vogel on Double Taxation Conventions is regarded as the international gold standard on the law of tax treaties This article by article commentary has been completely revised and updated to give you a full and current account of double tax conventions DTCs DTCs form the backbone of international taxation but they raise many interpretational questions This market leading work will provide you with the answers Based on the OECD G20 Multilateral Instrument the OECD MC and Commentary published in 2017 and the most recent amendments to the UN MC the book also includes relevant case law and scholarly literature upto and including 2020 Previous editions of the Vogel have been routinely relied on by courts around the world including Australia Canada Germany India South Africa the Netherlands and United Kingdom What s new in this edition There have been many important developments in this area since the last edition in 2015 The authors discuss these developments and the effect they will have upon practitioners working in this area They also provide a wealth of new and revised case law along with the DTCs of emerging countries You ll find Reports about major features in the DTC practice of many leading jurisdictions such as the DTC practice of Austria Canada France Germany India the Netherlands Switzerland the UK and the US Sections on divergent country practice covering their national models and networks of bilateral DTCs Thorough analysis of the OECD and UN model as well as the

implementation of these models in practice Amendments of bilateral DTCs textual or in substance on the basis of the 2017 Anti BEPS Multilateral Instrument Coverage of a full range of the latest tax treaties around the world including important treaties between OECD and BRICS countries This new Fifth Edition of Klaus Vogel on Double Taxation Conventions continues to reflect the unchallenged role of the OECD The OECD MC accompanied by the official Commentary guidelines reports and other recommendations has sustained its position as the most important legal instrument in the area of DTCs On occasion the UN MC and Commentary diverge from the OECD texts When this happens the authors deal with the specifics of the UN MC in separate annotations and analyses explaining and making sure you understand the differences How this will help you All the information you need to confidently advise on issues such as the taxation of income taxation of capital and the elimination of double taxation Know that your advice to clients is based on the most up to date and respected information available from an outstanding team of editors and authors The editors Professors Ekkehart Reimer and Alexander Rust have worked with the late Professor Vogel as well as an international team of top experts to completely update and enhance the content The writing team comprises Editors Prof Dr Ekkehart Reimer Heidelberg University and Prof Dr Alexander Rust WU Vienna Authors Johannes Becker Federal Ministry of Finance Berlin Alexander Blank University of Erlangen Nuremberg Katharina Blank Federal Ministry of Finance Berlin Michael Blank University of Erlangen Nuremberg Prof Dr Luc De Broe Catholic University of Leuven Laga Prof Dr Axel Cordewener Catholic University of Leuven and Flick Gocke Schaumburg Prof Dr Ana Paula Dourado University of Lisbon Daniela Endres Reich University of Erlangen Nuremberg Prof Dr Werner Haslehner University of Luxembourg Prof Dr Roland Ismer University of Erlangen Nuremberg Prof Dr Eric C C M Kemmeren Tilburg University Prof Dr Georg Kofler WU Vienna Sophia Piotrowski University of Erlangen Nuremberg Prof Dr Ekkehart Reimer Heidelberg University Prof Dr Alexander Rust WU Vienna Annika Streicher WU Vienna Prof Dr Matthias Valta Duesseldorf University Jens Wittendorff Ernst Kamilla Zembala Heidelberg University

Interpretation of Tax Treaties under International Law F. A. Engelen, 2004 This publication considers the interpretation of tax treaties primarily from the standpoint of public international law The principal purpose of this study is to analyse and discuss the rules and principles of international law relevant to the interpretation of treaties in general and their application to tax treaties in particular The rules of international law enshrined in articles 31 32 and 33 of the Vienna Convention on the Law of Treaties are therefore central to this study Where appropriate reference is made to the jurisprudence of the International Court of Justice and to the law and procedure of other international court and tribunals Considers also the extent to which the relevant rules and principles of international law are binding on domestic court and taxpayers The importance of international law for the purpose of the interpretation of tax treaties is illustrated by a number of leading cases decided by the Dutch Supreme Court Hoge Raad

Tax Treaties: Building Bridges between Law and Economics, 2010 In this book experts from the field of economics take a different view of tax treaty issues than experts from the field of law In order to encourage the much needed

communication between these two groups a cross disciplinary conference was held to discuss selected tax treaty issues from both a legal and economic perspective Twenty five conference papers on eight topics were prepared by lawyers and economists The papers on legal issues were presented and discussed by economists and vice versa The interdisciplinary focus of the conference not only allowed an exchange of knowledge between two groups who think differently about similar issues but also made it possible to better grasp the impact of the thinking of one group on the areas of interest to the other group The outcome of the conference is reflected in this book By showing the legal and the economic approaches to an issue this book improves the general understanding of the two disciplines and demonstrates how the decisions in one discipline may influence the other discipline and its concepts Twenty two contributions are included written by the most distinguished academics practitioners and representatives of several international tax administrations and both tax and economic institutions

Interpretation and Application of Tax Treaties in North America Juan Angel Becerra, 2007 This book presents an overview of the materials court cases and mutual agreement procedures implemented in Canada USA and Mexico In addition it provides a background to the development of tax treaty law and the information necessary to interpret a tax treaty based upon the principles codified in the Vienna Convention of the Law of Treaties Contents the background of the early model tax conventions the development of tax treaty law the specific materials from Canada the United States and Mexico proposal for a trilateral tax treaty for North America to provide full relief from the harmful barriers against free movement of capital and services

Special Features of the UN Model Convention Anna Binder, Viktoria Wöhrer, 2019-10-01 Detailed research on the UN Model Convention s unique features The UN Model Convention has a significant influence on international tax treaty practice and is especially used by emerging and developing countries as a starting point for treaty negotiations Driven by the aim to achieve consistency in the international tax treaty practice the structure and content is to a large extent similar in the UN Model and the OECD Model However whereas the OECD has historically focused its efforts on issues mainly relevant for developed countries the UN Tax Committee has continuously attempted to specifically take into account tax treaty policies for developing countries when drafting and amending the UN Model Convention Compared to the OECD Model Convention the UN Model Convention aims at giving more weight to the source principle Popular examples are the PE definition in the UN Model which provides for a lower threshold than Article 5 of the OECD Model or Article 12A on Fees for Technical Services which has been introduced with the latest amendment of the UN Model Convention 2017 and allows for a withholding tax to be levied on payments to non residents when the payer of the fee is a resident of that contracting State irrespective of where the services are provided Interestingly in the discussions of the tax challenges arising from the digitalization of the economy the OECD and the G20 are also exploring options to allocate more taxing rights to the jurisdiction of the customer and or user i e the market jurisdictions As this has traditionally been the focus of the UN Model Convention its unique features and developing countries practices could be taken into account when exploring new nexus

rules that are not constrained by the physical presence requirement This book contains the master s theses of the full time LL M program 2018 2019 for which Special Features of the UN Model Convention has been chosen as the general topic With this book the authors and editors do not aim at discussing each article of the UN Model Convention but rather focus on the unique features of the UN Model Convention which are explored in detail This is supplemented with an evaluation of the function and relevance of the UN Tax Committee in the international tax policy discussion and with an analysis of the influences of the OECD s BEPS project on the UN Model

International Tax Planning and Prevention of Abuse Luc De Broe, 2008 This study considers how tax authorities attempt to strike down international tax avoidance structures in particular those involving the use of conduit and base companies set up by third country residents for purposes of treaty shopping and EC Directive shopping The book focuses on the interaction between provisions and judicially developed doctrines of domestic tax law preventing international tax avoidance on the one hand and norms of international law in particular tax treaties and rules of Community law on the other It also considers treaty based anti avoidance measures such as the beneficial ownership requirement and limitation on benefits provisions This part of the study compares and analyses the case law of Australia Austria Belgium Canada the Czech Republic Finland France Germany India the Netherlands Switzerland the United Kingdom and the United States

CCH Guide to Researching Canadian Income Tax Yoko Beriault, Carol Mohammed, 2005-08

Residence of Companies Under Tax Treaties and EC Law G.M. Maisto (ed.), 2009 Deals with issues and problems raised by residence of companies for tax purposes including detailed analysis from a national viewpoint in selected European and North American jurisdictions Australia and South Africa

Preventing Treaty Abuse Daniel Blum, Markus Seiler, 2016-09-19 Analysis of notion roots and measures of treaty abuse The OECD initiative on Base Erosion and Profit Shifting has put the issue of treaty abuse and the means to counter it on top of the global political agenda Preventing treaty abuse is therefore currently one of the most debated topics in international tax law Diverging national legal traditions in combatting abuse both under domestic and tax treaty law have led to a globally diversified legal framework in this respect and make the OECD s agenda to harmonize these attempts even more challenging The aim of this book is to analyze the notion of treaty abuse its historical roots and the measures to counter it The book s topics cover a wide range of both policy and legal issues The contributions main focus lies on analyzing the proposals put forward by the OECD in BEPS action items 6 and 7 In addition this book analyzes the lessons which can be learnt from the US tax treaty policy and elaborates on the effects the intensified fight against treaty abuse will have from a Non OECD member state perspective Also EU law is taken into account and the question raised which impact the fundamental freedoms might have on the development of new anti avoidance rules Finally the relation between domestic and treaty based anti avoidance is analyzed in great detail identifying the methodical problems of ensuring a sound and abuse safe legal framework With this book the authors and editors hope to contribute to the discussion on selected issues of preventing treaty abuse and the challenges they present to

policy makers judges tax administrations and tax advisers **Dependent Agents as Permanent Establishments** Michael Lang, Josef Schuch, Claud Staringer, Pasquale Pistone, Alfred Storck, 2014-07-04

Dependent Agents as Permanent Establishments The article on business profits may be the most relevant one in tax treaties If patterned after the OECD Model Tax Convention this article allocates the exclusive taxing right over the profits of an enterprise to the residence country unless the enterprise carries on business in the source country through a permanent establishment Considering the importance of allocating taxation rights tax authorities and courts of many countries have increasingly focused on the concept of agency permanent establishment This book includes 12 chapters which provide an in depth analysis of the key aspects that need to be taken into account for interpreting the concept of agency permanent establishment It incorporates the perspectives of leading scholars and practitioners dealing with international tax cases This book is designed to provide essential insights to academics practitioners tax officials and judges who deal or are interested in the field of international taxation

International Company Taxation Ulrich Schreiber, 2013-01-30 The book is written for students of business economics and tax law It focuses on investment and financing decisions in cross border situations In particular the book deals with Legal structures of international company taxation International double taxation Source based and residence based income taxation International investment and profit shifting International corporate tax planning International tax planning and European law Harmonization of corporate taxation in the European Union International tax planning and tax accounting International tax law is designed to avoid international double taxation and to combat international tax avoidance Nevertheless companies investing in foreign countries may suffer from international double taxation of profits On the other hand these companies may also be able to exploit an international tax rate differential by means of cross border tax planning Ulrich Schreiber holds the chair of Business Administration and Business Taxation at the University of Mannheim He serves as co editor of Schmalenbachs Zeitschrift f r betriebswirtschaftliche Forschung zfbf and Schmalenbach Business Review sbr and is affiliated with the Centre for European Economic Research ZEW as a research associate Ulrich Schreiber is a member of the Academic Advisory Board of the Federal Ministry of Finance

Essays on International Taxation Dhruv Sanghavi, 2020-05-06 Fiscally transparent entities and tax treaty eligibility Shefali Goradia Triangular cases the neglected problem in tax treaty law Michael Lang Can tax treaty entitlement provisions for hybrid entities be refined Dhruv Sanghavi Non discrimination provisions in tax treaties Ajay Vohra Two to tango a dance of substance and form Bijal Ajinkya Deconstructing Principal Purpose Test under Article 7 of MLI Mukesh Butani Preventing treaty abuse in the context of multilateral instrument Dinesh Kanabar and Saurabh Shah Taxation of digital economy the journey India and across the world Daksha Baxi Digitalisation of the economy Our perspective on the OECD s Unified Approach Vikram Chand Reflections on the 2019 OECD proposal on Pillar One Guglielmo Maisto Implementation of BEPS and Amendments to Section 9 Radhakishan Rawal Public international law object and purpose MLI BEPS and the OECD Model Tax Convention Clive M

Baxter Tax laws through a constitutional prism Arvind P Datar Tax policy as a tool to enable impact investment and improve CSR targeting Meyyappan Nagappan and Nehal Binani Tax system design an analysis of some design choices made by the Indian Income Tax Act 1961 Shreya Rao Through the looking glass resolving tax disputes by arbitration under a bilateral investment treaty H David Rosenbloom **International Taxation of Cross-border Leasing Income** Amar Mehta, 2005

This book discusses the practical issues faced by the banks financial institutions companies engaging in leasing as a form of asset financing and their tax advisers The book elaborately deals with the divergent tax treatment in the five most important leasing jurisdictions ie US Japan Germany UK and Netherlands in respect of transaction characterization depreciation income recognition and anti avoidance rules as well as divergence in the relevant bilateral tax treaty provisions Further the book investigates how the parties to a cross border leasing transaction may obtain tax advantages due to such divergent tax treatments and whether and to what extent the general or specific anti avoidance rules in the jurisdictions may neutralize the tax arbitrage opportunities Finally it examines how the framework of the EC Treaty may be relevant for cross border leasing transactions between the EC Member States The International Taxation System Andrew Lymer, John

Hasseldine, 2012-12-06 International taxation is a vital issue for a growing number of business and individuals across the world The need to understand how the international system of taxation works is therefore a subject of importance to many people The International Taxation System provides this understanding by bringing together experts from the most important fields in the subject who have each authored chapters especially for this book They each provide brief structured and easy to understand explanations of the key concepts edited together into one volume to provide a unique very readable guide to the field While this text is aimed at masters or advanced undergraduate level students it will also be of interest to those requiring a professional understanding of the topic Each chapter introduces a different aspect of the international taxation system explains the important issues to be understood in each case and provides suggestions for discussion and further reading

Beneficial Ownership in International Tax Law Angelika Meindl-Ringler, 2016-06-07 In international tax law the term beneficial ownership refers to which parties involved in a cross border transaction are entitled to tax treaty benefits However determining beneficial ownership is a complex and often disputed issue subject to different meanings in different countries Archival research on its early use in tax treaties and in the developing OECD Model reveals that its meaning has changed dramatically over the decades leading to new interpretations significantly affecting current tax practice and scholarship This book dedicated to establishing how beneficial ownership should ideally be interpreted compares the use and interpretation of beneficial ownership both current and historical in a wide range of national jurisdictions as well as the EU ultimately shedding a clearer light than has heretofore been available on the meaning of the term In her very thorough analysis of the application of beneficial ownership the author touches on such aspects as the following historical development of the beneficial ownership requirement as used in tax treaties and in the OECD Model Tax Convention on Income and on Capital

rules of double taxation conventions application of the OECD's Action Plan on Base Erosion and Profit Shifting BEPS the problem of so called white income use of the substance over form principle attribution of income rules and the role of agents nominees and conduit companies Specific analysis of the use and interpretation of beneficial ownership in a domestic law and treaty context in numerous jurisdictions with particular emphasis on the United Kingdom Australia the United States and Germany is a major feature of the presentation As a thorough guide to determining whether a person claiming tax treaty benefits is the true owner and which parties are excluded from treaty benefits and to what extent this book will be of immeasurable value to lawyers tax authorities policymakers and other professionals working with taxable international transactions of any kind

Taxation of Investment Funds in the European Union Tomi Viitala, 2005 The book analyses the taxation of investment funds and their investors from the standpoint of domestic tax laws tax treaties and EC law It also provides a comprehensive understanding of the tax issues arising in the cross border transactions of investment funds and private fund investors in the European Union The viewpoints of the source state of income residence state of the investment fund as well as the residence state of the investor are all considered The book takes a comparative approach by covering five EU Member States the United Kingdom Germany France Luxembourg and Finland On the basis of the examination at the Member State level the present tax rules and practices are tested against the fundamental freedoms of the EC Treaty The conclusion is that there are still various tax measures that are likely to be in conflict with EC law The book also discusses possibilities of adopting targeted measures of positive integration at the level of the European Union with a view to enhancing the objective of the single investment fund market

The Taxation of Permanent Establishments Sven Hentschel, 2021-06-26 This book provides a comprehensive analysis of the rules governing the taxation of permanent establishments as implemented in the OECD Model Tax Convention and German national tax law Deviations between the OECD approach and the German approach are identified and modifications to the rules as a result of the Base Erosion and Profit Shifting BEPS project are examined Moreover challenges imposed to the PE concept as a result of the digitalisation of the economy are identified and discussed Against this background the Pillar One Blueprint proposing a long term solution to overcome the tax challenges arising from the digitalisation of the economy is presented and assessed against widely accepted overarching principles of tax policy

Hybrid Financial Instruments in International Tax Law Jakob Bundgaard, 2016-11-15 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

Klaus Vogel On Double Taxation Conventions Third Edition Book Review: Unveiling the Power of Words

In a global driven by information and connectivity, the power of words has be evident than ever. They have the ability to inspire, provoke, and ignite change. Such could be the essence of the book **Klaus Vogel On Double Taxation Conventions Third Edition**, a literary masterpiece that delves deep to the significance of words and their affect our lives. Written by a renowned author, this captivating work takes readers on a transformative journey, unraveling the secrets and potential behind every word. In this review, we will explore the book is key themes, examine its writing style, and analyze its overall impact on readers.

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