

Doble imposición internacional en una economía globalizada. Problemática en la empresa española*

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Palabras clave: Armonización fiscal, Convenios para evitar la doble imposición, doble imposición internacional, fiscalidad internacional, método de exención, método de imputación.

Este trabajo tiene partes bien diferenciadas, una introductoria descriptiva de las relaciones internacionales, para exponer a continuación una serie de ideas sobre lo que se considera la doble imposición internacional y las posibles medidas que se toman para evitarla, para pasar al caso más pormenorizado de la entidad jurídica española, y como le afecta, en algunos aspectos, en sus relaciones internacionales a través de sus actividades empresariales y financieras la tributación específica española sobre la doble imposición internacional que soporta.

1. INTRODUCCIÓN

La globalización ha supuesto una verdadera revolución en los modelos económicos conocidos, ha trastocado los modelos tradicionales cambiando la naturaleza y fundamentos de éstos. Los cambios en estos modelos tienen consecuencias en la fiscalidad, por lo que el legislador ha de conocer los mismos y prever su evolución para diseñar una adecuada normativa fiscal para no perder ingresos impositivos.

* Trabajo presentado al IV Curso Avanzado en Fiscalidad Internacional celebrado en la Escuela de la Hacienda Pública del Instituto de Estudios Fiscales en el segundo semestre de 2012.



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