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Taxing Multinational Corporations

Jennifer Blouin



Taxing Multinational Corporations:

Taxing Multinational Corporations Martin Feldstein, James R. Hines, Jr., R. Glenn Hubbard, 2007-12-01 In the increasingly global business environment of the 1990s policymakers and executives of multinational corporations must make informed decisions based on a sound knowledge of U S and foreign tax policy Written for a nontechnical audience Taxing Multinational Corporations summarizes the up to the minute research on the structure and effects of tax policies collected in The Effects of Taxation on Multinational Corporations The book covers such practical issues as the impact of tax law on U S competitiveness the volume and location of research and development spending the extent of foreign direct investment and the financial practices of multinational companies In ten succinct chapters the book documents the channels through which tax policy in the United States and abroad affects plant and equipment investments spending on research and development the cost of debt and equity finance and dividend repatriations by United States subsidiaries It also discusses the impact of U S firms outbound foreign investment on domestic and foreign economies Especially useful to nonspecialists is an appendix that summarizes current United States rules for taxing international income

Taxation of Multinational Corporations Jennifer Blouin, 2012 Taxation of Multinational Corporations aggregates the large body of international tax literature succinctly in one location

Taxing Multinationals in Europe Ernesto Crivelli, Ruud A. de Mooij, J. E. J. De Vrijer, Mr. Shafik Hebous, Alexander Klemm, 2021-05-25 This paper aims to contribute to the European policy debate on corporate income tax reform in three ways First it takes a step back to review the performance of the CIT in Europe over the past several decades and the important role played by MNEs in European economies Second it analyses corporate tax spillovers in Europe with a focus on the channels and magnitudes of both profit shifting and CIT competition Third the paper examines the progress made in European CIT coordination and discusses reforms to strengthen the harmonization of corporate tax policies in order to effectively reduce both tax competition and profit shifting

The Effects of Taxation on Multinational Corporations Martin Feldstein, James R. Hines, Jr., R. Glenn Hubbard, 2007-12-01 The tax rules of the United States and other countries have intended and unintended effects on the operations of multinational corporations influencing everything from the formation and allocation of capital to competitive strategies The growing importance of international business has led economists to reconsider whether current systems of taxing international income are viable in a world of significant capital market integration and global commercial competition In an attempt to quantify the effect of tax policy on international investment choices this volume presents in depth analyses of the interaction of international tax rules and the investment decisions of multinational enterprises Ten papers assess the role played by multinational firms and their investment in the U S economy and the design of international tax rules for multinational investment analyze channels through which international tax rules affect the costs of international business activities and examine ways in which international tax rules affect financing decisions of multinational firms As a group the papers demonstrate that international tax rules have

significant effects on firms investment and other financing decisions *New Foundations for Taxing Multinational Corporations* Mihir A. Desai,2004 In order to suggest new foundations for the taxation of multinational corporations this paper revisits the legislative foundations for much of the international tax regime and distills the lessons of recent economic research The review of the Revenue Act of 1962 suggests that the international provisions that remain today were the result of a political miscalculation were targeted at transient concerns and were expanded well beyond their original scope as the result of administrative complexities Evidence from the 1960s and 1990s is also suggestive of the fact that anti deferral provisions may foster the tax avoidance and tax haven activities that they seek to combat Recent research on the growing role of non income taxes the interactions between tax systems and corporate governance and new welfare benchmarks that arise from viewing FDI as being associated with productivity differences all recommend alternative rules for taxing the activities of U S multinational firms than are currently in place

The Taxation of Multinational Corporations Joel Slemrod,2012-12-06 The six papers in this volume represent state of the art empirical and conceptual research on various aspects of the taxation of multinational corporations They were commissioned for and presented at a conference organized by Price Waterhouse LLP on behalf of the International Tax Policy Forum held in Washington DC in March 1994 The first four papers were originally published in the May 1995 issue of International Tax and Public Finance The Slemrod paper appeared in the Policy Watch Section of the November 1995 issue of that journal The foregoing papers were subject to the normal refereeing procedures of the journal and the summaries that follow are drawn from there The Leamer paper has not been previously published Altshuler and Mintz examine one aspect of the 1986 U S Tax Reform Act the change in the rules for the allocation of interest expense between domestic U S and foreign source income In the absence of rules a parent with excess credits could reduce U S tax liability by allocating interest expense toward itself thus reducing its taxable domestic income without any compensating increase in either the U S tax due on foreign source income or the foreign tax due which is independent of U S rules

International Corporate Tax Avoidance: A Review of the Channels, Magnitudes, and Blind Spots Sebastian Beer,Ruud A. de Mooij,Ms.Li Liu,2018-07-23 This paper reviews the rapidly growing empirical literature on international tax avoidance by multinational corporations It surveys evidence on main channels of corporate tax avoidance including transfer mispricing international debt shifting treaty shopping tax deferral and corporate inversions Moreover it performs a meta analysis of the extensive literature that estimates the overall size of profit shifting We find that the literature suggests that on average a 1 percentage point lower corporate tax rate will expand before tax income by 1 percent an effect that is larger than reported as the consensus estimate in previous surveys and tends to be increasing over time The literature on tax avoidance still has several unresolved puzzles and blind spots that require further research

Taxing Multinationals Michael P. Devereux,R. Glenn Hubbard,2000 This paper analyzes the effects of tax policy on the strategic choices of a domestic multinational company competing with a foreign multinational company in a third country We

demonstrate the role of the effective average tax rate and the effective marginal tax rate on the company's choices. We consider the impact on national welfare of alternative tax policies for outbound investment. Our results differ from existing models. In contrast to Feldstein and Hartman (1979) in our model, taxing foreign source income on accrual with a deduction for foreign taxes is not generally optimal. However, unlike Mintz and Tulkens (1996), the optimal policy for domestic and outbound investment is linked through the strategic choices of the multinational.

Taxing International Business, Australia. Treasury, Australian Taxation Office, Organisation for Economic Co-operation and Development, 1997. Contributions by various authors to the APEC/OECD Symposium on International Business Taxation held on 30 October-1 November 1996, hosted by the Australian Treasury and the Australian Taxation Office. The meeting examined the tax policy and tax administration issues which arise in taxing international businesses. Discussions focused on the challenges facing tax administration over the next decade, problems encountered by APEC economies in applying the OECD Transfer Pricing Guidelines, and on how to minimise conflicts in this area both between Tax Administrations and taxpayers.

The International Taxation of Multinational Enterprises in Developed Countries, J. D. R. Adams, John Whalley, 1977. Monograph designed to outline the basic features of the tax treatment of multinational enterprises in developed countries and to present an evaluation of both present and alternative arrangements.

Multinational Corporations in World Development, United Nations, Department of Economic and Social Affairs, 1973.

Accounting for the Multinational Corporation, George C. Watt, Richard M. Hammer, Marianne Burge, 1978. Textbook on and guide to accounting practices for multinational enterprises based in the USA, presents advice relating to foreign exchange expropriation and nationalization, taxation of foreign income, the avoidance of double taxation, foreign investments and financial markets, change in interest etc, and includes a glossary of accounting terms, One page bibliography and statistical tables.

'Sharing the Pie': Taxing Multinationals in a Global Market, 2015. The current international corporate tax regime for taxing the business proceeds of firms operates arbitrarily. The aggregates of the nation states' international corporate tax systems seem to distort a global efficient allocation of resources. The current model of corporate taxation finds its origins in the 1920s. It was well suited to the economic realities of the early days of international trade and commerce, the times when international business primarily revolved around bulk trade and bricks and mortar industries. But those days are long gone. Globalization, European integration, the rise of multinational enterprises, e-commerce and intangible assets have changed the world considerably. These developments have caused the model to operate inconsistently with the economic reality of today. Corporate taxation and economic reality are no longer aligned. The model is ill suited to current market realities. As a result, multinational business decisions are distorted by tax considerations. The arbitrage may work to the benefit or detriment of nationally and internationally active firms. It also seems to put pressure on nation state corporate tax revenue levels. This may lead to spill-over effects and welfare losses. At the end of the day, matters seem to worsen in today's increasingly globalizing economy. The question arises as to whether a proper alternative for taxing

multinationals can be modeled How should business proceeds of multinationals be taxed Can we create something that suits the nature of a global marketplace somewhat better What would such an alternative tax system look like How would it operate This study seeks to set forth an alternative to the corporate taxation framework currently found in international taxation The aim is to develop some building blocks for an optimal approach towards taxing the business proceeds of multinationals i e a corporate tax 2 0 As a starting point the authority of currently applicable national international and European tax law are not necessarily accepted Accordingly applicable tax law serves illustrative rather than argumentative purposes in this research

International Taxation James R. Hines, 2007 Collection of articles on international aspects of taxation issues originally published in economic research journals in the period between 1980 and 2004 The various parts focus on foreign direct investment international borrowing tax avoidance tax competition and international tax policy implications

Taxing International Income Hugh J. Ault, David F. Bradford, 1989 This paper describes the basic U S legal rules that govern the taxation of international transactions and explores the economic policies or principles they reflect Particular attention is paid to the changes made by the Tax Reform Act of 1986 but it is impossible to understand the 1986 Act changes without placing them in the context of the general taxing system applicable to international transactions The exposition is intended to be intelligible to readers with either legal or economic training

Multinational Corporations in the Developing Countries Samarendra Chandra Sen, 1978 Results of research work done at the Max Planck Institut Fur Auslandsches Und Internationales Privatrecht Hamburg

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Articles of Agreement of the International Bank for Reconstruction and Development, as Amended Effective December 17, 1965 Articles of agreement of the International Bank for Reconstruction and Development, 1980

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