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The foreign corporation will be subject to U.S. income tax on its effectively connected income, and will also be subject to the branch profits tax on any of its profits not reinvested in the U.S. [citation needed] Thus, many countries tax corporations under company tax rules and tax individual shareholders upon corporate distributions. Various countries have tried (and some still maintain) attempts at partial or full "integration" of the enterprise and owner taxation.

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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 ...

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the proposed EU Common Consolidated Corporate Tax Base (CCCTB). International Company Taxation and Tax Planning by Dieter Endres and Christoph Spengel will be welcomed by practitioners engaged in the field of international taxation, whether they work in companies, law firms, or government. Interested academics will find here an unmatched comparative analysis of the global web of international taxation law and practice.

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An inquiry of this nature usually consists of two components: (1) whether the foreign company has sufficient in-state contacts to be subject to a state income, gross-receipts, or net-worth tax; and (2) whether the company would incur a tax liability if it were subject to tax. Doing business and nexus. Generally, a foreign company's state tax ...

State tax considerations for foreign companies with ...
this book offers an introduction to the legal and economic fundamentals of international company taxation it is written for students of business economics and tax law striving to

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In this edition of Inside Deloitte, the authors consider the various income tax nexus theories that state tax agencies may apply to companies located outside the United States, as well as other approaches that states may use to tax the income of a foreign company, including worldwide filing regimes, state tax haven laws, and other inclusionary rules for combined filing states.

Foreign companies and state income tax nexus | Deloitte US
Our international tax professionals are well-equipped to serve the specific needs of large international corporations, foreign nationals, high net worth individuals, family business owners and local business operators, among others. The right approach to international tax issues can be critical to business success.

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So, as we progress through this module we can start creating an understanding of international tax planning structures based on the newly acquired knowledge about corporate taxes. In this first video, I want to focus on Corporate income tax. Which is also, depending on the country involved, referred to as Company income tax, or Corporation tax.

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