

Answer Key

ABC, the U.S. company that applies innovative technology to manufacture diversified industrial and consumer products, has a strong global presence. Among the 200 countries where ABC sells its products, Germany and China are quite strong for the firm. Assume ABC has two wholly owned, and foreign incorporated, subsidiaries in those nations: ABC Germany and ABC China.

Last year (2011) ABC Germany earned 400,000,000 USD and ABC China 600,000,000 USD (both figures are pretax earnings). Suppose these two subsidiaries paid out all after-tax earnings back to the parent company, ABC U.S., headquartered in St. Paul, MN, in the form of dividend.

Please use the tax rates below for calculations:

U.S. corporate tax rate: 35%
 German corporate tax rate: 40%
 German dividend withholding tax: 0%
 Chinese corporate tax rate: 25%
 Chinese dividend withholding tax: 10%

1. How much corporate tax did ABC Germany pay to the German government?

$400,000,000 \times 40\% = \160 million

2. How much corporate tax did ABC Germany pay to the U.S. government?

\$0

3. How much tax did ABC U.S. pay to the German government for receiving the dividend from ABC Germany?

$(400,000,000 - 160,000,000) \times 0\% = \0

4. What kind of tax credit (foreign or indirect) could ABC U.S. get from the payments ABC Germany made in question 1?

Indirect

5. How much tax did ABC U.S. owe the U.S. government for its earnings from ABC Germany after all the tax credits are applied? (Hint: The figure could be negative to account for effect on overall tax liability.)

$400,000,000 \times 35\% - 400,000,000 \times 40\% = 0 = \0 million

6. How much corporate tax did ABC China pay to the Chinese government?

$600,000,000 \times 25\% = \150 million

7. How much dividend did ABC China send back to its parent company, ABC U.S.?

$600,000,000 - 150,000,000 = \450 million

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Daniela Niemeyer

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