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2012 EDITION



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incorporated in the book The present edition of the book has several unparalleled features which make it distinct from other available text books on Income Tax A simplified systematic approach to the understanding of a complex subject written in a unique simple and easy to understand language User friendly examination oriented style facilitating easy comprehension of each topic A unique feature of the revised edition is that Section wise Index has been incorporated The language of the book is simple and lucid Small illustrations and examples are given for ticklish law points so as to make them easy and self explanatory for students to understand the subject All important case laws and circulars notifications reported upto June 2022 have been incorporated **Australian Taxation Study Manual** , Solutions Manual to Accompany 1990 Annual Edition, West's Federal Taxation--comprehensive Volume William H. Hoffman,1989 *Direct Tax including Tax Planning & Management* AY 2020-21 Dr. H.C. Mehrotra, Dr. S.P. Goyal,2020-07-01 The present 41st edition of the book has been thoroughly revised in the light of the amendments made by The Income Tax Act 1961 The Income Tax Rules 1962 as amended up to date The Finance Act 2019 the Finance No 2 Act 2019 the Finance Act 2020 and the Taxation Laws Amendment Act 2019 as applicable to Assessment Year 2020 21 and the Latest Circulars and Notifications of C B D T The salient features of the book are The language of the book is simple and lucid All important aspects of Tax Planning and Management for the Assessment Years 2020 21 and 2021 22 have been included in the book Small illustrations and examples are given for ticklish law points so as to make them easy and self explanatory for students to understand the subject Provisions of Taxation and other Laws Relaxation of Certain Provisions Ordinance 2020 dated 31 3 2020 have been incorporated in the book In the chapter Deduction and Collection of Tax at Source reduced rates applicable for the period from 14 5 2020 to 31 3 2021 have been incorporated All important case laws and circulars notifications reported upto June 2020 have been incorporated At the end of the book salient features of Direct Tax Vivad se Vishwas Act 2020 have been incorporated More than 500 solved illustrations have been given in various chapters from the questions set for examinations conducted by the various Universities *International Taxation of Income from Services under Double Taxation Conventions* Marta Castelon,2016-04-24 The provision of international services has increased enormously mainly due to the precipitous growth of the digital economy Accordingly the interpretation and application of double taxation conventions DTCs to income from services has become a dominant focus in the international taxation This multiple award winning book is an indispensable tool for practitioners and a major contribution to the debate about tax reform It responds to the need for a comprehensive overview of the tax opportunities and risks relating to the provision of international services It also offers the first in depth analysis of the taxation of income from services vis vis the multilateral instrument MLI resulting from the OECD's Base Erosion and Profit Shifting BEPS initiative With the thorough analysis of the international taxation of income from services over the last two centuries the author sheds new light on present tax policy debates and develops workable proposals for bringing brick and mortar DTCs into the digital reality With an abundance of case studies treaty interpretations

appraisals of policy discussions and practical solutions the author examines every aspect of the subject including the following the Model DTCs of the OECD the United Nations Germany and the United States their similarities and differences relationships among the MLI the Model DTCs and specific DTCs development of the provisions dealing with services in the DTCs how tax authorities and courts of different countries e.g. the United States Germany Brazil India and China apply DTC provisions on the taxation of international services opportunities and risks relating to different business practices such as the subcontracting of services provisions the hiring out of labour the secondment of employees and the engagement of contract and toll manufacturers practical questions about the taxation of different distribution models from fully edged distributors to commissionaires challenges and proposals relating to the differentiation between various types of services under DTCs the permanent establishment concept to what extent the structure purposes and scope of DTCs differ from those of the General Agreement on Trade in Services GATS how changes in the US Model DTC of 2016 affect international service provisions and proposed changes to amending the OECD and UN Model DTCs Viable proposals to simplify DTC provisions dealing with service income and align them with current challenges such as the digital economy and the increasing volume of remote services are offered particularly in light of the likely impact of the BEPS package and its subsequent MLI This book is poised to become one of the key practice resources for tax lawyers in house counsel and policymakers in the coming years Interested academics too will benefit from the author's skill in recognizing the ongoing role of taxation fundamentals in the major revolution currently underway

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