



Kpmg Tax Planning Guide

Sidney Kess, Barbara Weltman



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introduces and analyses the international tax issues relating to international manufacturing and distribution activities extending from the tax regime in the country where the manufacturing activities are located through to regional purchase and sales companies to the taxation of local country sales companies. The analysis includes the domestic tax laws relating to manufacturing and distribution company profits as well as international tax issues relating to income flows and the payment of dividends. Among the topics and issues analysed in depth are the following: foreign tax credits, taxation in the digital economy, tax incentives, intellectual property, group treasury companies, mergers and acquisitions, leasing, derivatives, controlled foreign corporation provisions, VAT and customs tariffs, free trade agreements and customs unions, transfer pricing, role of tax treaties, hedging, related accounting issues, deferred tax assets and liabilities, tax risk management, supply chain management, depreciation allowances and carry forward tax losses. The book includes descriptions of 21 country tax systems and ten detailed case studies applying the analysis to specific examples. Detailed up to date attention is paid to the OECD Action Plan on Base Erosion and Profit Shifting (BEPS) and other measures against tax avoidance. As a full scale commentary and analysis of international taxation issues for multinational manufacturing groups including in depth consideration of corporate structures, tax treaties, transfer pricing and current developments, this book is without peer. It will prove of inestimable value to all accountants, lawyers, economists, financial managers and government officials working in international trade environments.

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