

International Company Taxation and Tax Planning

Edited by
DIETER ENDRÉS & CHRISTOPH SPENGEL



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Preface

‘Look before you leap’ – for those about to embark on a venture abroad, tax considerations are certainly worth an intense look. Unfortunately, taxation is also one of the most complex of the many subjects pressing for attention. Long gone are the days when international taxation was only of interest to multinational corporations and a few specialists within national tax administrations. Small and medium sized businesses can quickly find themselves paying taxes in several countries as can private individuals crossing borders. This book is offered as a guide through the international ramifications of taxation. It explains the principles behind the taxation systems of many countries, shows how the various types of tax interact and concludes with a description of commonly used planning techniques to optimize the tax positioning.

As the book is intended to facilitate the understanding of international tax issues and give guidance to the principles behind the thinking of tax planners, it may very well serve as a work of reference for students and teachers in the academic world or for those involved in staff training in commercial organizations. However, first and foremost it is intended for practitioners working in the field of international taxation, be it on their own account, or be it on behalf of others. For many, risk avoidance, compliance requirements and protecting their business reputations are not the least of the taxation issues they face, particularly in the light of the current BEPS project of the OECD. Naturally, they are also concerned to keep the worldwide tax burden to a minimum. Regardless of the main focus of interest, tax risk management or tax planning, the reader will be able to see the broad picture necessary to keep up to date on his or her specific subjects of interest and to avoid pitfalls in the practical application.

Realizing the need for a manual both in daily tax practice as well as for university lectures the editors followed the recommendation of Ernest Hemingway: ‘The shortest answer is doing the thing.’ The book summarizes several courses on comparative international taxation and tax planning offered at the Business School of the University of Mannheim. The focus, therefore, is a business perspective. Many individuals have contributed to this work, but above all else the editors would like to thank their co-authors, Stefan Brunsbach, Christina Elschner and Andreas Waltrich, for their magnificent efforts. Special thanks go to Andrew Miles. Andrew proved himself to be

an indispensable aid with his review of the final text for linguistic style and technical accuracy. Finally the editors are indebted to the University of Mannheim, to the Centre for European Economic Research (ZEW) at Mannheim and to PwC Germany – all organizations committed considerable resources to the support of this project.

The manuscript was finalized in the first quarter of 2015 and immediately taken up by the publishers, Kluwer Law International – thanks are due to them, too, for their friendly and helpful support. Comments and suggestions for improvement are always welcome.

Dieter Endres
Frankfurt
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Mannheim
March 2015

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