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Chapter 3 Understanding U.S. International Tax Policy (Tax Foundation University 2018: Lecture 3)

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3.3.1.3 Taxation of income from “direct” investment Non-
residents can engage in direct investment in New Zealand either
through a branch (that is, an unincorporated “fixed
establishment”), or a subsidiary (that is, an incorporated “fixed
establishment”). 3.3.1.3.1 Branch investment

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Chapter 3: The Right to Tax Individuals. Principles of International
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Chapter 3 Double Tax Treaties 3.1. Introduction A significant role of a double tax agreement (DTA) between two or more countries is to remove the double taxation (discussed in chapter 2), which is an impediment to cross-border trade in goods and services, and the move-ment of capital and people between countries. Many countries have now

Chapter 3 Double Tax Treaties 3.1. Introduction

This chapter explains the implications for the taxation of non-residents flowing from the above decisions. The two most

important sources of income earned by non-residents are debt (money that foreigners lend to New Zealand firms) and equity (direct investment in New Zealand firms). Taxes on non-residents raise significant amounts of revenue.

Taxing income across international borders - a policy ...

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