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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

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fixed establishment). 3.3.1.3.1 Branch investment

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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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each chapter, making the book suitable for academic as well as professional use.

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This chapter reviews first the key developments of international business and the development of the multinational enterprise and then discusses some of the developments related to the systems for international taxation that arose to address this cross border trading growth.

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