



# Principles of International Taxation

*Angharad Miller, Lynne Oats*

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The third edition contains 43 new sub-chapters covering areas such as:

Interpretation of double tax treaties;

Company residence after Smallwood;

From credit to exemption method †“ the 2009 UK tax reforms;

Dispute resolution under tax treaties: competent authority proceedings, use of binding arbitration clauses;

HMRC6 following Gaines-Cooper;

Worldwide review of practices on recognition of permanent establishments;

Taxation of international trade in services;

UK worldwide debt cap †“ rationale and structure;

National and supranational initiatives to combat the use of tax havens;

Finding a way forward: CFC legislation in EU Member States post Cadbury Schweppes.

Principles of International Taxation deals with the legal issues and planning points central to international taxation, using simple examples and diagrams throughout to aid the reader's understanding. Lists of further reading are given at the end of each chapter, making the book suitable for academic as well as professional use.

This is an essential title for lawyers and accountants practising in the area of international tax, candidates studying for Paper 1 of the Advanced Diploma in International Tax and for both postgraduate and undergraduate university students.

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