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effect subject to section 31(2)(a) (no deduction for foreign tax if credit

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in different countries; individuals travel
from one country to the other for
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may include sales between companies
in different countries; individuals travel
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business or any other purpose;
generation of income in one country as
a result of investments made by
individuals or corporations of another
country; or services rendered by
residents of one country to persons in
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3.3.1.3 Taxation of income from

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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 movement of capital and

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people between countries. Many countries have now

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Introduction

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

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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.

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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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