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companies in  
different  
countries;  
individuals  
travel from one  
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other for  
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generation of  
income in one  
country as a  
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by individuals  
or corporations  
of another  
country; or  
services  
rendered by  
residents of one  
country to  
persons in  
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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

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(that is, an incorporated “fixed establishment”).

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ment of capital  
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between  
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countries have  
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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

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