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2 Taxation (International and Other Provisions) Act 2010 (c. 8) Part 2 – Double taxation relief

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version (as it was originally enacted). (4)Subsection (1)— (a) has effect subject to section 31(2)(a) (no deduction for foreign tax if credit

Taxation (International and Other Provisions) Act 2010

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abroad by a person or company subject to taxes; may include sales between companies in different countries; individuals travel from one country to the other for 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 another country etc ...

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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 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.

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