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Treaties**

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Types of Models Tax

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Income - Basic Income \u0026  
the Work Problem [OECD Tax]**

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How do tax treaties work?  
Base Erosion Profit Shifting  
(BEPS): All change in the  
world of tax

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OECD Tax Talks #17 - Centre

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International Taxation  
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Multilateral BEPS Convention

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~~(MLI) Tax Treaties, Part 1~~

## **Model Tax Convention On Income**

1. This Convention shall apply to taxes on income imposed on behalf of a Contracting State irrespective of the manner

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in which they are levied. 2.  
There shall be regarded as  
taxes on income all taxes  
imposed on total income, or  
on elements of income,  
including taxes on gains  
from the alienation of  
property.

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## **United States Model Income Tax Convention**

The complete texts of the following tax treaty documents are available in Adobe PDF format. If you have problems opening the



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pdf document or viewing  
pages, download the latest  
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Reader. For further  
information on tax treaties  
refer also to the Treasury  
Department's Tax Treaty  
Documents page.

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**United States Model – Tax  
Treaty Documents | Internal  
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This publication is the  
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Tax Convention on Income and

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text of the Model Tax  
Convention as it read on 21  
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member economies' positions,  
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Tax Treatment as per OECD  
Model Tax Convention:  
Payment received after  
termination of the

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On Capital: Salary is taxable in the State where the employment activity was exercised. Payment received for unused holidays accrued. Salary is taxable in the State where the holidays were accrued.

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Income from Employment |  
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Article 15 | OECD Model Tax  
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Convention. Simon Webber  
SimonWebber. Rod Koborsi

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RodKoborsi. On April 25,  
2019, the OECD released the  
2017 full version of the  
Model Tax Convention on  
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("MTC"). The newest release  
includes the full text of  
the MTC as it was released

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On November 21, 2017, with  
additional information  
including articles,  
commentaries, non-member  
economies' positions,  
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Council and background  
reports.



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Tax Convention on Income and

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On Capital, first published in 1992 and periodically updated since then. This condensed version includes the text of the Model Tax Convention as it read on 21 November 2017 after the adoption of the tenth update

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by the Council of the OECD.

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The OECD Model Tax  
Convention on Income and on  
Capital (the OECD Model)  
provides a means of settling

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on a uniform basis the most  
common problems that arise  
in the field of  
international juridical  
double taxation.

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and the OECD Model Tax  
Convention on Income and on  
Capital (the OECD Model  
Convention) have had a  
profound influence on  
international treaty  
practice, and have  
significant common

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**United Nations Model Double  
Taxation Convention**

2006 U.S. Model Income Tax  
Convention - 4 - Article 2  
TAXES COVERED 1. This  
Convention shall apply to



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taxes on income imposed on  
behalf of a Contracting  
State irrespective of the  
manner in which they are  
levied. 2. There shall be  
regarded as taxes on income  
all taxes imposed on total  
income, or on

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Tax Convention of November  
15, 2006**

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On Capital of the condensed  
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Tax Convention on Income and  
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Recommendation of the OECD  
Council, the historical  
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number of background reports  
adopted after 1977.

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Interest is commonly known as the income earned on the movable capital. Unlike dividends, interest does not suffer the economic double taxation and is not taxed both at the hands of the

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debtor and the creditor. The payer of the interest gets the deduction, whereas the recipient has to discharge taxes. Article 11 of the OECD Model Tax Convention covers the taxation of interest income.



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Income from Interest |  
Article 11 | OECD Model Tax  
Convention

The Model Tax Convention,  
and the worldwide network of  
treaties based on it,  
provide clear consensual

**Read Book Model Tax  
Convention On Income And  
On Capital** rules for taxing income and  
capital across countries,  
Version 2017 Edition 2017  
Volume 2017 while avoiding having income  
or capital taxed twice by  
two different countries.

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**Model Tax Convention on**

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On 7 June 2017, 76 countries  
and jurisdictions signed or  
formally expressed their  
intention to sign an  
innovative multilateral  
convention that will swiftly

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implement a series of tax  
treaty measures to update  
the existing network of  
bilateral tax treaties and  
reduce opportunities for tax  
avoidance by MNEs. Read  
more. With tax playing an  
important role in the

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response to the coronavirus  
(Covid-19) pandemic, the  
OECD has outlined a range of  
emergency tax measures  
governments could adopt to  
curb ...

**Tax treaties - OECD**

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A new US model treaty (“The 1996 United States Model Income Tax Convention” – US MC) was released in September 1996. It offers insights into the US Treasury’s views on treaty interpretations, and its



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negotiating posture in tax treaties, particularly its right to tax its citizens and corporations on their worldwide income.

## **Model Tax Conventions: Background and Benefits**

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OECD Tax Treaty Model vs. UN  
Tax Treaty Model The  
Organization for Economic Co-  
operation and Development  
(OECD) is a group of 36  
countries with a drive to  
promote world trade and  
economic progress.....

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