

Les Cfd Pour Les Nuls

Hussin A.Rothana

Acta Mathematica ,1887

Mémoire ,1985

Précis de droit fiscal international Xavier Oberson,2022-02-03 La cinquième édition du Précis de droit fiscal international tient compte de l'ampleur des réformes intervenues ces dernières années, notamment depuis 2014. Cette période a vu le développement sans précédent de normes visant à lutter contre la double non-imposition, la concurrence fiscale dommageable, la planification fiscale agressive et l'utilisation d'instruments hybrides dans le cadre du programme BEPS qui a démarré en 2013 (programme ayant engendré de nombreuses modifications du droit fiscal international et du droit interne). Un instrument spécifique - l'instrument multilatéral - a par ailleurs été ratifié par plusieurs États, dont la Suisse, afin de permettre la mise en œuvre des règles du programme BEPS, qui modifient les conventions de double imposition, et a élargi le domaine de l'arbitrage international. En outre, l'assistance internationale en matière fiscale, depuis le fameux « big bang » de 2009, s'est étendue à l'échange automatique de renseignements financiers, à l'échange spontané sur les rulings fiscaux et à la remise de déclaration pays par pays. Enfin, la taxation des entreprises numériques a continué de faire l'objet de discussions et a débouché sur de nouvelles propositions en matière d'imposition des entreprises multinationales dans le cadre de ce que l'on appelle les piliers 1 et 2 de l'OCDE. Ce précis analyse tous ces développements et reproduit la structure classique de l'ouvrage en six parties, à savoir : (i) généralités ; (ii) règles unilatérales du droit fiscal international de la Suisse ; (iii) CDI conclues par la Suisse en matière d'impôts sur le revenu et la fortune ; (iv) les CDI en matière d'impôts sur les successions ; (v) aspects de procédure (y compris l'échange de renseignements) et (vi) les accords bilatéraux entre l'Union européenne et la Suisse. Une septième partie consacrée à la taxation des entreprises numériques et aux deux piliers de l'OCDE a été ajoutée.

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