

TAXATION LAW RESEARCH PROGRAMME
ASIAN INSTITUTE OF INTERNATIONAL FINANCIAL LAW
www.AIIFL.com
FACULTY OF LAW
UNIVERSITY OF HONG KONG

Globalisation and the Future of Corporate - Shareholder Taxation

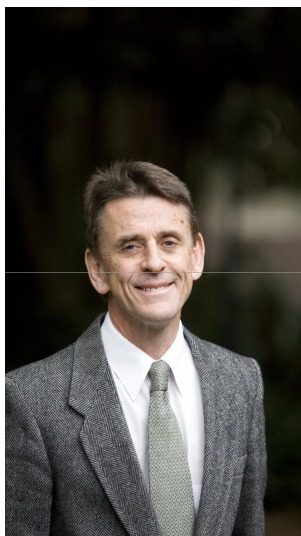
C John Taylor

Professor

*School of Business Law and Taxation, Australian School of Business
The University of New South Wales*

Wednesday, 15 December 2010, 1:00 – 2:00 pm
Room LG102, LG1 Floor, KK Leung Building, HKU

Globalisation is placing source based corporate taxes under increasing pressure as exemptions for international investment income become widespread. Many countries have lowered their corporate rates and have adopted partial (Germany) or full (Singapore) dividend exemption systems but have not removed distortions between debt and equity financing and of investment choices. This paper evaluates approaches to relief at the corporate level (which can both reduce effective corporate rates and neutralise the debt and equity finance choice) and examines their implications for major capital importers and exporters (like China) and for countries (like Hong Kong and Singapore) that current exempt dividends and tax on either a source or remittance basis.



Professor C John Taylor is Head of the School of Business Law and Taxation in the Australian School of Business at the University of New South Wales. He received a BA, an LLB and an LLM(Hons) from the University of Sydney and a Grad Cert in Higher Education from the University of New South Wales. Professor Taylor's main areas of research have been: capital gains tax; corporate - shareholder taxation; taxation treaties; and tax simplification. He was the sole author of *Capital Gains Tax: Business Assets And Entities* (Law Book Company, 1994), has been a contributing author to all four editions of *Understanding Taxation Law* (Lexis Nexis, 2002, 2004, 2009 and 2010) to the Australian Tax Practice commentary on *Income Tax Assessment Act 1997* and to *Australian Tax Practice*. The journals he has published in include: *Melbourne University Law Review*, *British Tax Review*, *Bulletin For International Fiscal Documentation*, *Australian Tax Forum*, and *Australian Tax Review*. He is a current joint editor of *The Journal of The Australasian Tax Teachers Association*. John was the Inaugural Honorary Research Fellow of the Taxation Institute of Australia and in that capacity was the principal author of *Beyond 4100: A report on measures to combat rising compliance costs through reducing tax law complexity*, Taxation Institute of Australia, 2006. From 2006 to 2007 John conducted contract research for the Commonwealth Department of the Treasury on anti avoidance provisions in the income tax.

Please register on-line via www.AIIFL.com or
email Flora Leung at fkleung@hku.hk if you are interested to attend.