

International and Special Tax (IST)

... Data for global Taxation

- Detailed data on the German Foreign Transaction Tax Act (AStG) (Controlled Foreign Corporations Rules)
- Check-the-Box (US)
- Stamp-Duty (UK)

The taxation in Germany is getting more and more influenced by global tax law. On the one side, German financial institutions with foreign customers or activity abroad, must consider different local taxation regimes.

On the other side, the tax legislator adjusts new laws to the international situation, also for the conclusion of respective creative leeway, if necessary.

The following information segments are described in the product "International and Special Tax (IST)":

German Foreign Transaction Tax Act (AStG)

To take advantage of tax creative leeways was, i.a., the reason for the legislator to adjust the German Foreign Transaction Tax (AStG), i.a., for capital investment companies. The Foreign Transaction Tax is supposed to ensure that taxation is made in Germany even though income or assets are transferred abroad.

This means that capital investment companies may be subject to the controlled foreign corporations rules as per Section 7 of the German Foreign Transaction Tax Act (AStG).

WM provides a classification, if the company is subject to the regulation as well as the corresponding income data.

Check-the-Box Taxation

Check-the Box is a taxation option in the US. This means that certain companies have, regardless of their actual legal form, the option to be taxed as a partnership or a corporation.

WM provides the information on the tax status a company has selected for itself.

This information is supposed to support financial institutions in the interpretation and processing of the income reportings of US companies.

Stamp Duty Taxation (UK)

Within the UK, British shares, subscription rights, warrants with Great Britain as country of origin and custody as well as certain foreign shares with Great Britain as country of custody (share register), are subject to the UK Stamp Duty taxation.

The withholding tax (currently 0.5%) is levied, even if the instrument is listed solely at a foreign stock exchange.

WM provides the information, if a financial instrument is subject to the UK Stamp Duty taxation.

