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2 *Taxation (International and Other Provisions) Act 2010 (c. 8) Part 2 – Double taxation relief* CHAPTER 3 – Miscellaneous provisions Document Generated: 2020-06-24 Status: This is the original version (as it was originally enacted).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

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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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