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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: The Right to Tax Individuals. Principles of International Taxation. Edited by: Lynne Oats and Emer Mulligan Publisher: Bloomsbury Professional Edition: 7th edition Publication Date: 2019

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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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