

## Doing Business in Australia

### Tax and Business Structuring – Tax and Revenue

Cowell Clarke has assembled a highly experienced and capable Tax & Revenue Group with the necessary capabilities to provide specialist taxation advice on structuring and other related issues for overseas clients investing and conducting business in Australia.

In particular, we provide specialist taxation advice on the following:

### Experience

- Repatriation of profits and other income sources (royalties, dividends and interest) from Australia, including withholding tax obligations;
- Tax residency (including corporate tax residency and permanent establishment issues);
- Foreign resident capital gains tax and taxable Australian property holding entities;
- State taxes in all Australian State and Territory jurisdictions (e.g. stamp duty, payroll tax and land tax);
- Interaction between Double Taxation Agreements and Australia's domestic taxation laws;
- Seconding staff to Australia, including tax-related employer obligations;
- Optimal group structuring in Australia to accommodate foreign resident shareholders, including incorporating companies in Australia and related corporate tax matters;
- Financing Australian operations (debt/equity and gearing abilities);
- Inter-entity dealings (including transfer pricing issues);
- Goods and Services Tax (similar to VAT regimes in other jurisdictions); and
- Foreign exchange issues.

In accordance with our firm's ethos, we always strive to ensure our advice is strategic, practical and astute. We would be delighted to offer our assistance to you with any client-related matters.

If you would like to know more, the Tax and Revenue Group publish a newsletter series, "Expanding Business into Australia – A Tax Perspective", which can be found along with our other client alerts and updates [here](#).



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