

# Fisco Agenda 2016

**Ediciones Fiscales Isef, S.A.**

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**The Concept of Permanent Establishment in the Insurance Business** Daniele Frescurato, 2021-04-22 sinness models adopted by insurance companies; and comparative analysis of double tax treaty policies adopted in a number of countries with respect to the permanent establishment provision in the insurance business, highlighting Switzerland for comparative purposes. In a concluding chapter, the author proposes changes to the definition of the dependent agent permanent establishment currently enshrined in the model treaties and their respective commentaries, aligning such a definition to the regulatory framework in which insurance companies conduct their business in countries other than that of incorporation. As a highly significant and timely contribution to the study of the interplay between insurance regulation and tax implications,

this very original work will prove of especial value to practitioners in international tax and insurance law, as well as professionals in the financial services sector and tax academics.

*PREVENCIÓN DE SANCIONES EN MATERIA LABORAL 2017* Dr. Jacinto García Flores , La lectura de este libro permitirá a los patrones conocer la normativa que establece las obligaciones laborales a su cargo, ya que el entorno laboral es factible para que carezcan de la información que les es aplicable. Conozca esta inigualable obra para la PREVENCIÓN DE SANCIONES EN MATERIA LABORAL, y visualice como proteger el patrimonio de una empresa sin menoscabo del derecho de los trabajadores. CONTENIDO: ABREVIATURAS INTRODUCCION CAPITULO I. INDEBIDAS CONDUCTAS PATRONALES SANCIONADAS POR LA LEY FEDERAL DEL TRABAJO I. Introducción II. Concepto de responsabilidad y sanción III. ¿Por qué en la LFT se establecieron responsabilidades y sanciones? IV. Marco jurídico sancionador de la responsabilidad del patrón y del trabajador V. La unidad de medida y actualización VI. El caso particular del Título Dieciséis de la Ley Federal del Trabajo VII. ¿Cómo afecta al patrimonio empresarial la aplicación de multas laborales? VIII. Carácter fiscal de las multas impuestas por la inspección del trabajo CAPITULO II. CONDUCTAS PATRONALES INDEBIDAS SANCIONADAS POR EL REGLAMENTO FEDERAL DE SEGURIDAD Y SALUD EN EL TRABAJO I. Introducción II. Contenido del artículo 514 abrogado de la LFT III. Disposiciones organizacionales para la seguridad y salud en el trabajo de carácter general IV. Sanciones contra los patrones por violaciones al RFSST CAPITULO III. LA AUDITORIA LABORAL I. Introducción II. ¿Qué se debe entender por documento? III. Fundamento legal de la obligación patronal de elaborar la documentación que ordena la LFT IV. Aspectos prácticos de la auditoría laboral CAPITULO IV. LOS NUEVOS CONTRATOS DE TRABAJO Y SU UTILIZACION POR LA EMPRESA I. Introducción II. El contrato individual de trabajo III. Duración de las relaciones de trabajo CAPITULO V. LA CAPACITACION Y EL ADIESTRAMIENTO I. Introducción II. Diferencia entre capacitación y adiestramiento III. La capacitación y el adiestramiento, medios para aumentar la producción y productividad de las empresas IV. Formatos expedidos por la STPS V. La comisión para evaluar la capacitación de los trabajadores VI. El comité nacional de productividad VII. Sanciones aplicables a los patrones por no capacitar y adiestrar a los trabajadores CAPITULO VI. LA VULNERABILIDAD DE LAS MIPYMES EN MATERIA LABORAL Y DE SEGURIDAD SOCIAL EN MEXICO I. Introducción II. La importancia de las MIPYMES en el mundo III. El portal electrónico “tu empresa” IV. La vulnerabilidad de la existencia de las MIPYMES BIBLIOGRAFIA LEGISLACION REFERENCIAS ELECTRONICAS

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*Sustainability and Megaproject Development* Franca Cantoni, Edoardo Favari, 2022-07-08 Megaprojects, also referred to in the literature as Large Engineering Projects or Major Projects, are generally defined as large-scale investment initiatives worth 1b€/€ or more and, facing similar problems independent of the country where they are implemented and the industry they belong to. The common feature of most megaprojects is that they are difficult to design and manage so that their

realization and completion is always extremely expensive, often over budget and delivery deadlines also are not met. In the worst-case scenario, they remain unfinished. This book, through its multidisciplinary approach, offers food for thought and alternative interpretations for the complex world of megaprojects. While much research has been conducted and differing approaches have been developed over the last 20 years, there is still a lot of debate surrounding the topic, and a holistic approach for effectively managing these initiatives is still missing. What is clear to all researchers and experts in the field is that a traditional-linear management approach is simply not sufficient, as at many stages of a megaproject, iterative and feedback effect occurs due to stakeholder involvement and increasing and continuous interaction between them. The book promotes the debate among all categories of stakeholders involved in the megaproject's supply chain, in order to increase the awareness of complex phenomena relating to the critical issues and common problems they face, all over the world, and to seek performance improvement across the whole life cycle of a megaproject, including the selection, design, construction, operation and de-commissioning. The multidisciplinary approach cultivated in the book conveys an innovative way to study megaprojects and their inherent complexities.

**Complexity and Sustainability in Megaprojects** Edoardo Favari, Franca Cantoni, 2023-05-31 This book showcases the discussion about megaprojects carried out at the MeRIT (Megaproject Research Interdisciplinary Team) workshop 2022: the crisis, discontinuity, rising prices, and supply chains disruption force radical reflection for those involved in megaprojects. It raises a modern-day challenge, the creation of value for stakeholders. Indeed, the aim of the volume is to encourage readers to think more broadly, articulately and less stringently than the mainstream claims. There is a need to design, implement, and manage megaprojects by abandoning the old paradigm that leveraged solely on time and cost. We need to move beyond that by going to explore the value generated, the positive impact on people, communities and territories. Economic, social and environmental sustainability takes on a new and broader articulation: issues of the circular economy applied to megaprojects are addressed and ample space is ensured for the inclusion of social needs in current practices.

**The Economy of Collaboration** Francesco Ramella, Cecilia Manzo, 2020-11-29 Over the past few decades, the world economy has undergone radical transformations, in part connected to the expansion of the 'digital economy', in part to the growing interconnection via the internet of the world of objects and physical processes. This 'great transformation' poses the dilemma on the capitalism's ability to reconcile economic and social value, keeping together economic well-being, social cohesion and political freedom. The Economy of Collaboration can offer a contribution in this direction but requires courageous policies to mediate the various interests at stake, as well as to rethink and make more sustainable its development, by increasing the benefits not only for businesses but also for workers and consumers. In short, to create shared value. This book refers to a mode of organizing the production, distribution and consumption of goods and services based on cooperative relations. The main reference is to activities linked to the digital economy, since they are the emerging

forms of a definitely older phenomenon, but which is expanding on an ever-wider scale thanks to new technologies. These collaborative activities can be regulated differently, along a continuum that ranges from the pole of market exchanges to that of generalized reciprocity, with various intermediate mixed forms.

Amazon dietro le quinte Martin Angioni,2020-05-21T00:00:00+02:00 In meno di venticinque anni Amazon è diventata una delle tre aziende con la più alta capitalizzazione di Borsa. Supera i duecentottanta miliardi di dollari di fatturato, gli ottocentomila dipendenti, i tre milioni di venditori attivi sulla piattaforma di vendita. Qual è la ricetta di un così straordinario successo? La cultura aziendale fondata sull'innovazione, l'organizzazione del lavoro, l'ideologia imposta ai dipendenti e il carattere carismatico del fondatore Jeff Bezos sono gli ingredienti fondamentali. Ma fondamentale è risultata anche la carenza di regolamentazione da parte degli Stati nazionali. Martin Angioni, che è stato un top manager di Amazon, conosce bene questa multinazionale, che resta misteriosa per chi la osserva da fuori, e analizza luci e ombre della sua storia, da dietro le quinte. Ed è una storia che interessa tutti, perché Amazon è oggi un impero e in quanto tale pone seri problemi per la concorrenza di mercato, l'autonomia di scelta dei consumatori, la possibilità di controllo da parte dei cittadini.

**La participación procesal del notario en la promesa de compraventa de bienes inmuebles** Masapanta Bonilla, Dr. Mario Bayardo,2023-03-01

*New Metropolitan Perspectives* Carmelina Bevilacqua,Francesco Calabrò,Lucia Della Spina,2020-08-31 This book presents the outcomes of the symposium "NEW METROPOLITAN PERSPECTIVES," held at Mediterranea University, Reggio Calabria, Italy on May 26-28, 2020. Addressing the challenge of Knowledge Dynamics and Innovation-driven Policies Towards Urban and Regional Transition, the book presents a multi-disciplinary debate on the new frontiers of strategic and spatial planning, economic programs and decision support tools in connection with urban-rural area networks and metropolitan centers. The respective papers focus on six major tracks: Innovation dynamics, smart cities and ICT; Urban regeneration, community-led practices and PPP; Local development, inland and urban areas in territorial cohesion strategies; Mobility, accessibility and infrastructures; Heritage, landscape and identity;and Risk management,environment and energy. The book also includes a Special Section on Rhegion United Nations 2020-2030. Given its scope, the book will benefit all researchers, practitioners and policymakers interested in issues concerning metropolitan and marginal areas.

Guida al transfer pricing Antonella Della Rovere,Pietro Schipani,Carola Valente,Piergiorgio Valente,Federico Vincenti,2024-06-24 Il Volume "Guida al Transfer Pricing. Documentazione, analisi economiche e casi applicativi" si rivolge a tutti gli operatori economici e fornisce suggerimenti pratici e spunti tecnico-operativi per l'adozione, da parte dei gruppi di imprese, delle best practice in tema di prezzi di trasferimento. La normativa in materia di prezzi di trasferimento prevede, infatti, che le transazioni intercorrenti tra imprese appartenenti al medesimo gruppo multinazionale debbano riflettere le stesse condizioni previste nei rapporti con e tra soggetti indipendenti. Sarà necessario predisporre specifiche analisi aventi

l'obiettivo di comprendere la value chain del gruppo, le singole operazioni intercompany, il ruolo funzionale e di rischio di ogni impresa con l'obiettivo finale di selezionare la metodologia di determinazione dei prezzi di trasferimento che meglio si presta alle specifiche circostanze del caso e dimostrare la conformità delle politiche di transfer pricing adottate al principio di libera concorrenza. L'applicazione al caso concreto richiede pertanto una visione completa del transfer pricing e di tutte le problematiche ad esso connesse nonché una corretta comprensione del modello di business, delle caratteristiche peculiari del settore di riferimento e della catena del valore adottata dai gruppi multinazionali. La Collana Fiscalità Internazionale, diretta da Piergiorgio Valente, affronta in maniera esaustiva le tematiche di principale attualità nel panorama della fiscalità internazionale, tenendo conto dello scenario economico nel quale le imprese, italiane ed estere, si trovano ad operare. Mediante lo studio teorico-analitico, l'approfondimento tecnico-applicativo, le esemplificazioni in casi di studio e i riferimenti alla prassi professionale, la Collana ha l'obiettivo di fornire a studiosi, professionisti, manager d'azienda e funzionari dell'amministrazione risposte adeguate alle problematiche concrete degli investimenti all'estero.

**Meritocracy, Growth, and Lessons from Italy's Economic Decline** Lorenzo Codogno, Giampaolo Galli, 2022-09-05  
This book draws lessons on the importance of meritocracy for economic growth by analysing Italy's economic decline in the past few decades. Connections, rather than merit, are a long-standing feature of the Italian elites, even in the corporate sector. This became a significant problem when Italy's economy could no longer grow due to imitation, devaluation, and public debt, and faced the challenges of becoming a frontier knowledge-based open economy. This book uses international comparisons on social capital, governance, the role of the public sector, efficiency of the judiciary, education, gender and social inequality, social mobility, corporate standards, financial structures, and more to evaluate Italy's economic performance. It argues that the arrogance of mediocrity is more damaging than that of meritocracy. Italy experienced an economic miracle after the Second World War, and it is still an advanced economy and a member of the G7. Until the 1960s it seemed destined to catch up with the best-performing countries. Then the growth engine stopped, its debt skyrocketed, and Italy became a weaker member of the Eurozone. Many other countries in the world have heavy historical legacies and low social capital, and many others have to make the jump from imitation led growth to endogenous growth. The lessons drawn from studying Italy's case can therefore have important international applications.

**El intercambio automático de información financiera para fines fiscales** Miguel Angelo Splendore Maciel, 2021-01-19 El giro hacia el estándar de intercambio de información automática (AEOI) ha sido tratado demostrándose el cambio y los principales eventos en el escenario tributario internacional, transitando por el informe de la OCDE sobre la competencia fiscal perjudicial de 1998; por la publicación del Modelo TIEA de intercambio de información en 2002; por los ajustes al artículo 26 de la Convención Modelo de la OCDE, en 2005; por la crisis financiera de 2008; por las influencias del Programa FATCA, de 2010; por las declaraciones de Austria, Suiza, Luxemburgo sobre intercambio de información; la

declaración del G5 sobre adherir a un intercambio automático de información financiera con Estados Unidos, y las subsiguientes declaraciones del G20 que motivaron que la OCDE y el Foro Global crearan e implementaran un modelo automático de intercambio de información financiera para fines fiscales. Preceptos de orden práctico y teórico.

*Progressividade, redução da desigualdade e federação* Laís Gramacho Colares, 2023-03-22 A desigualdade econômica e a crescente concentração de riquezas no mundo são um problema não apenas moral, mas também político-social porque maculam o princípio democrático. O caminho que as políticas econômicas têm adotado diante de grandes crises só tem agravado o problema. Isso ficou evidenciado com a pandemia da Covid-19. No Brasil, a tributação regressiva é um agravante. Uma reforma tributária que pretenda enfrentar esse problema deve estar voltada para a progressividade. Isso, entretanto, esbarra no problema da divisão de competências tributárias próprias do federalismo fiscal brasileiro. A forma como este está organizado faz com que a tributação sobre a produção e consumo tenha maior protagonismo do que a da renda. Tornar o sistema progressivo significa inverter essa lógica. O objetivo do presente trabalho é formular uma proposta com base em direcionamentos, para tornar o sistema tributário progressivo, garantindo a autonomia dos entes federativos, através de um equilíbrio entre redução da desigualdade e federação. Chegou-se à possibilidade da criação de uma competência tributária concorrente entre a União e os estados para instituir imposto sobre a renda, principal imposto do sistema no que diz respeito à justiça fiscal. O resultado que se define para os direcionamentos é que o Sistema Tributário Nacional seja progressivo, considerando todas as incidências em conjunto, e que a distância entre as faixas de renda após a tributação seja reduzida.

*Temas de Derecho Minero y Energético* Ana Milena Vásquez Domínguez, Marina Motta Benevides Gadelha, Margarita Ricaurte Rueda, Diana Carolina Sánchez Zapata, Adriana María Sanín Vélez, Clara Inés Atehortúa Arredondo, Ana Restrepo Londoño, Laura Juanita Villanueva Marroquín, Sebastián Cabrales Villalba, A I Arenas Molina, C E Guzmán Ávila, L C Cleves Forero, A Lucio Chaustre, Carlos Alberto Aguilar Hurtado, Xiomara Lorena Romero Pérez, José Antonio Vega Araújo, Luisa Toledo Plata, Milton Fernando Montoya Pardo, 2022-05-02 El Departamento de Derecho Minero-Energético de la Universidad Externado de Colombia y su grupo de investigación -Instituto de Estudios en Regulación Minera, Petrolera y Energética- presentan a la comunidad académica, profesionales, autoridades, comunidades y gremios la edición número 16 de su ya consolidada Colección de Regulación Minera, Petrolera y Energética, denominada en esta oportunidad Temas de Derecho Minero y Energético.

**Complexity and Sustainability in Megaprojects** Franca Cantoni, Laura Corazza, Ernesto De Nito, Primiano Di Nauta, Edoardo Favari, 2024-05-20 This book showcases the discussion about megaprojects carried out at the MeRIT (Megaproject Research Interdisciplinary Team) workshop 2023: the crisis, discontinuity, rising prices, and supply chains disruption force radical reflection for those involved in megaprojects. It raises a modern-day challenge, the creation of value for stakeholders. Indeed, the aim of the volume is to encourage readers to think more broadly, articulately and less



stringently than the mainstream claims. There is a need to design, implement, and manage megaprojects by abandoning the old paradigm that leveraged solely on time and cost. We need to move beyond that by going to explore the value generated, the positive impact on people, communities and territories. Economic, social and environmental sustainability takes on a new and broader articulation: issues of the circular economy applied to megaprojects are addressed and ample space is ensured for the inclusion of social needs in current practices.

**Sustainable Transition of Meat and Cured Meat Supply Chain** Anna Maria Fellegara, Riccardo Torelli, Andrea Caccialanza, 2023-08-22 This edited volume provides an innovative perspective on the future of food systems. The contributors analyse relevant issues for a sustainable and responsible food consumption and cover fundamental steps for a broader approach to the sustainability of meat-based products. The book presents several issues and solutions to engage food firms in a measurable ecological transition. Topics discussed include not only the pedagogical perspective on sustainable food consumption, the evolution of (meat-based) food production systems and the animal welfare perspective, but also the adaptation of firm's strategies to the sustainable transition, the effects of climate change on agri-food firms' governance structures and the evolution of consumers perceptions on meat-based products and the role of CSR labels. This book targets managers and entrepreneurs who work in the meat industry and are seeking to improve their socio-environmental performance and governance, accountants that works at the production of sustainability reports for food companies, researchers working at the cutting edge of the food and environmental fields, professionals working in the meat industry and researchers interested in the investigation of novelties in European food regulation.

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