

[1, (10)-1].

24 [5]; 24, 25 [6]); « » , (. 23,

470-471], [4, 241], (23, 24 [5]) (24, 25 [6]). (distributions). « »

[§ 316 [7], 1.312-6-1.312.15] () 829(1),
[8]). , « - 830 [13]). (. 1000(1) [14])
» , « - » (.)

[15].

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[3, . 473].

»³.

()

(incongruent profit distributions),

«

), (6(1) [16]); (. 133(1)
(. 829; 33, . 1000 [13]); (. [18]), [19], (. 108-109 [20]).
15(1) [17]); (§ 316 [7]).

« » ()

[1] [2],

(). (. 2(22) [21]).

(, , ,
49% , ,
99% , ,
51% , , 1%
)².

25

43

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2

().
 - [7]), 9, (. 158, 243 bis
 - [20]), [3, . 481], (. 22-2, 23
 , [5]; . 23, 37 [6]).

4

(dividends "in kind", "in specie" "in natura")

(. . . 123(5) [22],⁵,⁶),⁷,⁸,⁹),
 (.¹⁰,¹¹ [12]).

10

()

[3, . 481], 7,
(. 52(2) [17]), (§ 311(b))

4	30.07.2012	03-03-10/84 (-
			-
	16.08.2012		-4-

3/13610C), 24.06.2008 03-03-06/1/366.
5 Baker McKenzie's Cash Repatriation Heatmap. United Arab Emirates. Key Initial Planning Considerations. URL: <https://resourcehub.bakermckenzie.com/en/resources/cash-repat-map/emea/united-arab-emirates/topics/key-initial-planning-considerations#1#5ff2de061fe94b77af2d473075f75c7e> (15.12.2025).

⁶ . . . 201 Civil and Commercial Code. URL: <https://library.siam-legal.com/laws-of-thailand/>, (: 05.12.2025).

⁷ 171 Taxation of Chargeable Gains Act 1992. URL: <https://www.legislation.gov.uk/ukpga/1992/12/contents> (

⁸ 08.12.2025). . . 171. § 20 Einkommensteuergesetz. URL: <https://www.gesetze-im-internet.de/estg/DE1NP0100502024.html> (

(§311 () [7]).

08.12.2025); § 8 Körperschaftsteuergesetz. URL: https://www.gesetze-im-internet.de/kstg_1977/BJNR025990976.html (Stand: 08.12.2025).

⁹ . §§33a(1), 33b(1,2). Income Tax Act (Tuloverolaki) 1535/1992. URL: <https://www.finlex.fi/fi/lainsaadanto/1992/1535> (- : 08.12.2025).

10 . 03.12.2024 03-07-
11/121626, 07.06.2024 03-07-11/52884, 07.02.2023
03-03-06/1/9480, 07.02.2018 03-05-05-01/7294,
25.08.2017 03-03-06/1/54596.

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 (,);
 (,);
 (2009/133/).

»¹² . , « »

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$$\left(\quad, \quad \right) - \left(\quad \right)$$

(,)

5 (§ 355(e) [7]).

11 07.06.2024 03-07-11/52884.

12 29.07.2021 302-
21 -11699 -21086/2020, 31.07.2015 302-
12 29.07.2021 302-

(bonus shares),

(stock dividends).

15

(),

$$(\quad)^{16}.$$

()

« »

¹⁴ Worldwide Tax Summaries Online // PwC. URL: <https://taxsummaries.pwc.com/> (18.12.2025)

taxsummaries.pwc.com/ | 15 2 2 43

15 2 . 2
16 19 317

¹³ Worldwide Tax Summaries Online // PwC. URL: <https://taxsummaries.pwc.com/> (: 18.12.2025).

. 105.3

(§ 312, 316(a) [7]).

¹⁷ . § 20(1), . 2 Einkommensteuergesetz. URL: <https://www.gesetze-im-internet.de/estg/BJNR010050934.html>. §20(1). (08.12.2025).

¹⁸ . . . § 27(1) . . . 3 Korperschaftsteuergesetz. URL: https://www.gesetze-im-internet.de/kstg_1977/BJNR025990976.html
(. . . : 08.12.2025).

) »²².

[3, .483; 4, .513].

41

»23

« »

4

(redemptions),

»²¹

(earnings and profits)

6 . 252 .
27.09.2021 308- 21-7618
53-15494/2019 (. 8 ,

19 4 1 251

20 08.09.2021 03-08-
05/72939, 28.02.2020 03-08-05/14771.

21 27.05.2025 03-03-06/1/51864.

16.12.2021 -4-7/17685@).

, ()

(§ 302()(1)-(4) [7]).

2. ()

[3, . 489], ²⁴, ²⁵, [3, . 490]).

[4, . 527].

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27.

« »

, , , , . 1 . 1 . 208, . 2-3
, , , , . 1 . 250

(),

[3, . 489].

3. (),

, ((. 53(2)
(a)(iv), . 84(2), 84(6) [17]), (. 24 [5]; (.
25 [6]):

28.

().

4.

(). (. 16 [16]) (.
(. 1033-1048 [14]) (.

208

()

. 1 . 1

(²⁶, . 1000(1) [14]).

29:

(,)

²⁴ . 5.1. Income Tax Act 2001. URL https://stacks.Stanford.edu/file/druid:bh082zh0439/Netherlands_Income%20Tax%20Act%202001_page6.pdf (: 08.12.2025).

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²⁶ . 205-30(1) table item 9. Income Tax Assessment Act 1997. URL: <https://www.legislation.gov.au/C2004A05138/latest/text> (: 08.12.2025).

²⁷ . 1 . 1 . 208, . 2-3 . 1 . 250 .

²⁸ . 2 . 1 . 250 .

²⁹ . 5 . 1 . 208; . 3 . 2.1; . 2.3 . 210; . 10,
12 . 214.1 .

30,

250 000

31.

2 : (1)

()³².

; (2) ()

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(. . 2(22)() [21])

[3, . . 493].

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(. . 1030 [14]), 33,

[3, . . 493] (§ 331,334(a), 336 [7]).

(),

³⁰ 1 . 1 . 220
³¹ 2 . 2 . 220
07.04.2022 03-04-05/29529, 22.12.2021 03-04-
05/104880.

(. . 47 [16]).

³² 4 . 1 . 251
³³ . . § 11 Körperschaftsteuergesetz. URL: https://www.gesetze-im-internet.de/kstg_1977/BJNR025990976.html (. .
08.12.2025).

3.

()

[17]), (. 3(1)() [23]), (. 112-3 [2]) (. 84(3)
[5]),

»,

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(. 3(1)() [23]).

(.).

« »

(.)

(.) (.)

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