TAXATION OF DERIVATIVES:
INTERNATIONAL TAX LAW ISSUES
Confusion and lack of uniformity: which solution?

1° PROBLEM

CLASSIFICATION OF DERIVATIVE CONTRACTS

1° PROBLEM SOLUTION

Accounting: Adoption of International Accounting Principles
(IFRS, IAS or GAAP);

Taxation-Accounting conformity;

2° PROBLEM

CLASSIFICATION OF INCOME ARISING FROM DERIVATIVE CONTRACTS:
WHICH KIND OF INCOME FROM DERIVATIVES?

2° PROBLEM SOLUTION

Does OECD Model Convention
provide for an exhaustive tax treatment of derivatives?

If not, reform of:

OECD Model Tax Convention: a new article?

OECD Model Tax Convention Commentaries: clarifications?