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This manual has been compiled by Customs and Border Protection as a joint effort with the Foreign-Trade Zones Board, the U.S. Census Bureau and the National Association of Foreign Trade Zones. Their contributions to this document are appreciated.

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competitive labor

costs, and rapid

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rapidly turning it into

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promising markets in the world. Data by the Bangladesh Bank (BB) shows that the country received \$961 million in the fiscal year 2008-09, while FDI inflow increased to \$2.54 billion in FY16-17.

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INTRODUCTION

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ordinary income derived from a passive foreign investment into capital gain income. To combat this perceived abuse, Congress introduced the concept of a passive foreign investment company (PFIC) by enacting Internal Revenue Code (IRC) § 1291, §1293 through §1298. The PFIC rules apply to any

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taxable year beginning after December 31, 1986.

Chapter 6 Passive Foreign Investment Companies

Triggering event:
threshold lowered to 10% of the voting rights (formerly 25%)
Foreign investment control now applies to the direct or indirect crossing, by an investor acting alone or in concert, of the 10%

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threshold of the voting rights of a company governed by French law and which is listed on Euronext Paris [1]. The procedure only applies where the French listed target company falls into ...

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