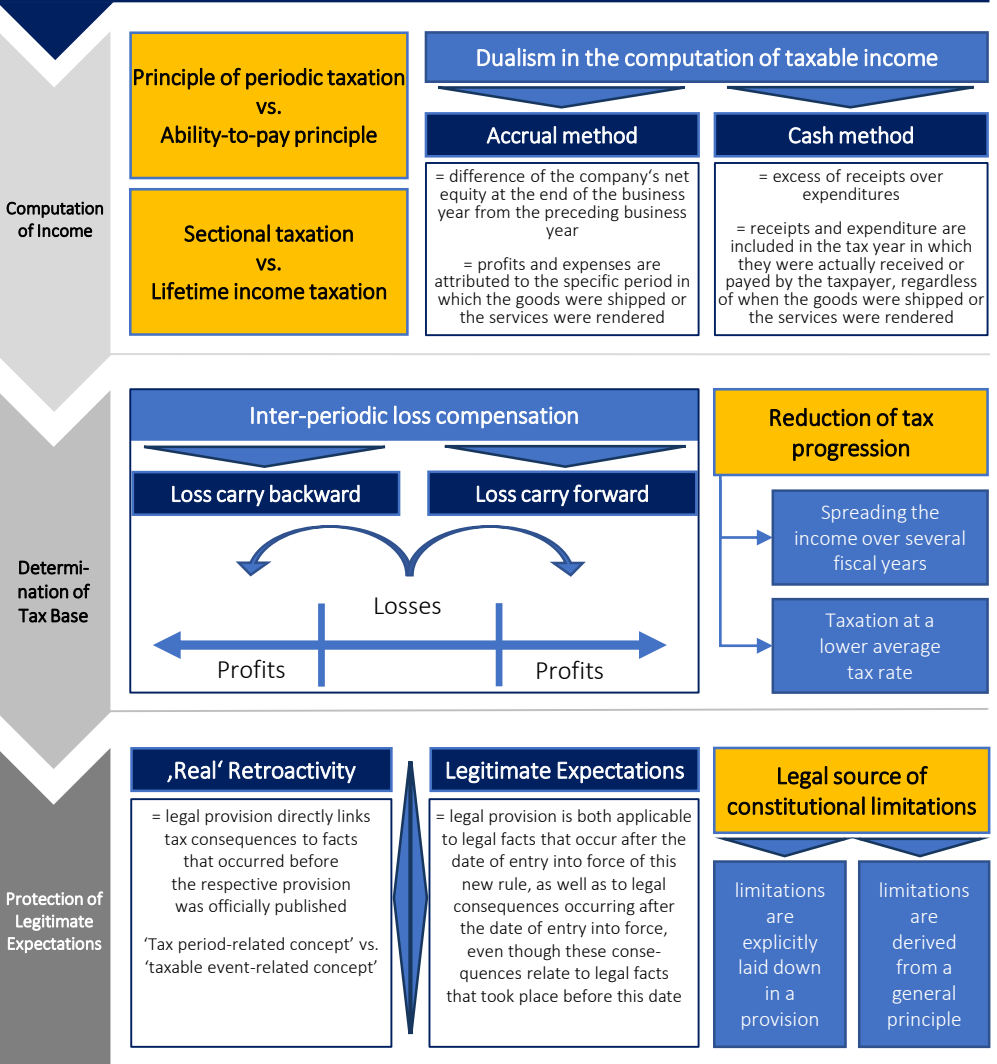


# Time and Income Tax Law

Computation of Income – Determination of Tax Base – Protection of Legitimate Expectations



Open questions...

- |  |   |
|--|---|
| <b>Computation of Income</b>                 | <ul style="list-style-type: none"> <li>▪ Sectional taxation vs. lifetime income taxation: Is the ability-to-pay principle assessment periodic or over the lifetime?</li> <li>▪ Which impact has the computation method (accrual or cash) on the allocation of expenses and the anticipation of expenses?</li> </ul> |
| <b>Determination of Tax Base</b>             | <ul style="list-style-type: none"> <li>▪ Which restrictions on inter-periodic loss compensation are convincing from a tax policy perspective and which are not?</li> <li>▪ Which options to counteract the effects of a progressive tax scale are possible?</li> </ul>  |
| <b>Protection of Legitimate Expectations</b> | <ul style="list-style-type: none"> <li>▪ 'Real' Retroactivity vs. Legitimate Expectations</li> <li>▪ What are the limits of the legislator to retroactively amend tax laws?</li> <li>▪ Principle of Equality, Rule of Law, Legal Certainty ...?</li> </ul>  |

