

RESUMÉ

Corporate Income Tax

The aim of this diploma thesis on “Corporate Income Tax” is to outline the current legal background of the corporate income tax and assess and evaluate the most substantial changes regarding the Act no. 586/1992 Coll., Income Tax Act, as amended that have become effective as of January 1, 2014. The changes discussed in this thesis include especially, but are not limited to, the changes adopted in connection with the recodification of Czech Civil Law.

This thesis consists of Preamble, Chapters 1 through 4 and Conclusion.

Chapter 1 “Tax and the Czech Tax System” addresses taxes and the tax system within the meaning of a general theory of tax law. This Chapter provides a general introduction to the concept of taxes, description of the purposes of taxes and the tax system and tax framework of the Czech Republic.

Chapter 2 “Corporate Income Tax” provides analysis of the corporate income tax in accordance with the Income Tax Act. It focuses in particular on the key structural elements of the corporate income tax. i.e. subject and object of the tax, tax assessment base, tax rate and the taxation period. This Chapter aims not only to outline the current corporate income tax legislation, but also to point out the most substantial changes effective as of the beginning of the year of 2014 and evaluate these changes as compared to the former wording of the respective provisions.

Chapter 3 “Additional Changes of the Income Tax Act” introduces other changes regarding the Income Tax Act that may be considered to be important with regard to the corporate income tax.

The last chapter of this thesis, i.e. Chapter 4 “Fund in the context of the Corporate Income Tax”, focuses on extended analysis of the new civil law institute of a “trust” and its status as a tax-payer of the corporate income tax. The analysis includes especially, but is not limited to, the particularities of the trust as opposed to other, “traditional”, taxpayers of the corporate income tax. When possible, the organizational structure of this Chapter corresponds to the structure of Chapter 2 and it is, therefore, further divided accordingly.