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Lei Huang

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related parties within a corporate group along with the arm s length standard corporate tax residence standards and definition of source for corporate income tax purposes with a particular emphasis on the permanent establishment concept The book explores their respective origins supposed tax policy rationales structural problems and interactions ultimately showing how the way tax jurisdiction is currently defined through them inherently tends to trigger profit shifting outcomes In view of the conclusions of the study the author suggests the use of a new version of the traditional benefit principle the presumptive benefit principle that would contribute to address the profit shifting phenomenon while serving as a practical quideline to achieve a more equitable allocation of taxing rights among jurisdictions Finally the book submits a number of proposals inspired by the aforementioned guideline that aspire to strike a balance between equity effectiveness and technical feasibility They include a new corporate tax residence test and most notably a proposal on a new remote sales permanent establishment How this will help you With its case study based on the Apple group empirically demonstrating the existence of the profit shifting phenomenon its clearly documented exposure of the reasons why traditional corporate income tax regimes systematically give rise to these outcomes its new tax policy guideline and its proposals for reform this book makes a significant contribution to current tax policy discussions concerning corporate income taxation in cross border scenarios It will be warmly welcomed by all concerned policymakers scholars practitioners with the greatest tax policy challenges that corporate income taxation is facing in the contemporary world Social Sciences and Humanities Index ,1916 The United States Catalog Mary Burnham, Carol Hurd, 1928 Classified Guide to Technical and Commercial Books

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