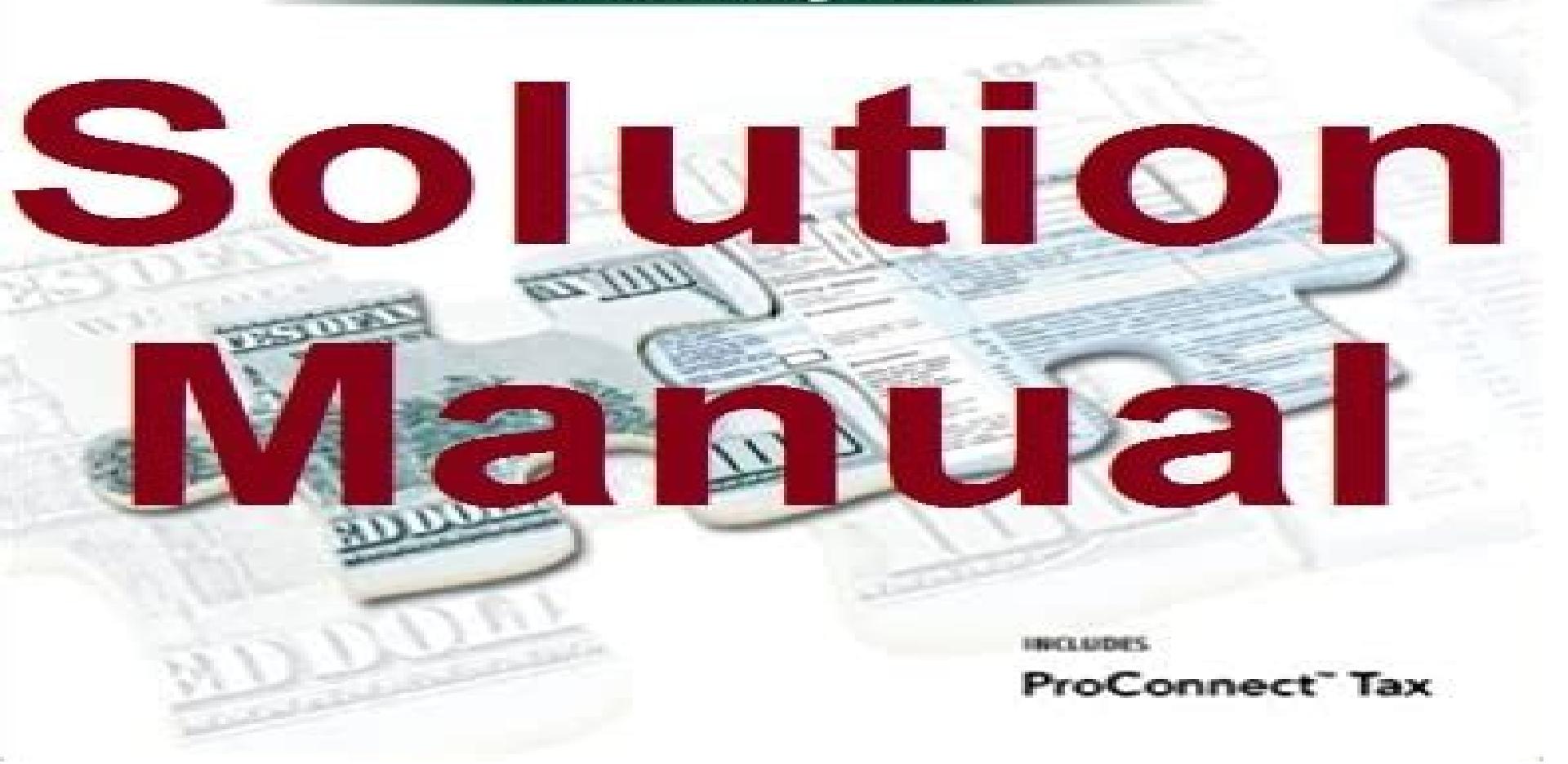


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Apportionment in the Post-BEPS Era Jie Wang,2025-12-09 Series on International Taxation The OECD s Base Erosion and

Profit Shifting BEPS Project and its maturing two pillar solution have their origin in a consensus that the existing international tax system requires significant reform particularly in addressing the taxation of multinational enterprises MNEs and the digitalization of the global economy This ground breaking book explores in great depth how formulary apportionment FA by which MNEs allocate profits across countries based on real activity in each jurisdiction thus removing the incentive to shift reported income to low tax locations can become a fundamental reform option in the evolving context of international taxation In light of the fact that FA represents a transition from a bilateral to a multilateral mechanism it becomes crucial to study how each market country assesses its feasibility This research selects China thus concentrating on the dynamics of one of the world's largest economies and demonstrating the broad implications of China's ongoing strategic FA experiment for the global tax system The author considers and analyses such aspects of the subject as the following FA centred perspective of the evolution of the international tax regime complexity and nuances involved in transferring equity principles from domestic to international tax contexts neutrality as an evaluative benchmark in tax policy design impact and shaping influence of China's Belt and Road Initiative on its tax policies and strategy and recommended formula for an international FA regime to explore Included is a comparative study of the current FA systems in the United States Canada the European Union's Common Consolidated Corporate Tax Base CCCTB Proposal and the newly introduced Pillar One Amount A By deconstructing these systems into constituent elements the author offers a component by component analysis and extracts lessons for the future architecture of international FA with respect to highlighting its function and what practical lessons can be drawn With the digital transformation exacerbating existing tax system flaws to an intolerable level for most stakeholders and as dissatisfaction with the current allocation framework has grown among both developing and developed nations the re emergence of formulary apportionment is becoming an increasingly concrete reality in the modern global economy In recognition of continuing efforts to improve the international tax system this book explores the foundational values and principles that need to be considered when developing an analytical framework for formulary apportionment with practical insights for reform on a global level It will be welcomed by tax professionals policymakers and researchers worldwide

Essential English for Competitive Examinations - 2nd Edition Dr. Rashmi Singh, 2019-08-04 Disha's ESSENTIAL ENGLISH true to its name covers every essential topic and every essential type and pattern of MCQs asked in various competitive examinations conducted in India It will serve as a SINGULAR VOLUME to provide complete preparation for scoring high in the English section of any competitive exam Essential features of the book Organised into IV parts Grammar Verbal Aptitude RC Descriptive English including 40 Chapters grouped under 10 Segments Grammar topics and sub topics explained in an easy to understand manner Classroom Exercises to test and reinforce in depth understanding of Concepts Extensive Exam pattern MCQs on each Topic to give you complete practice Dedicated Chapters for every specific MCQ pattern Things To Remember Strategies To Employ for solving each Question Type 5000 MCQs in all with Answers and

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