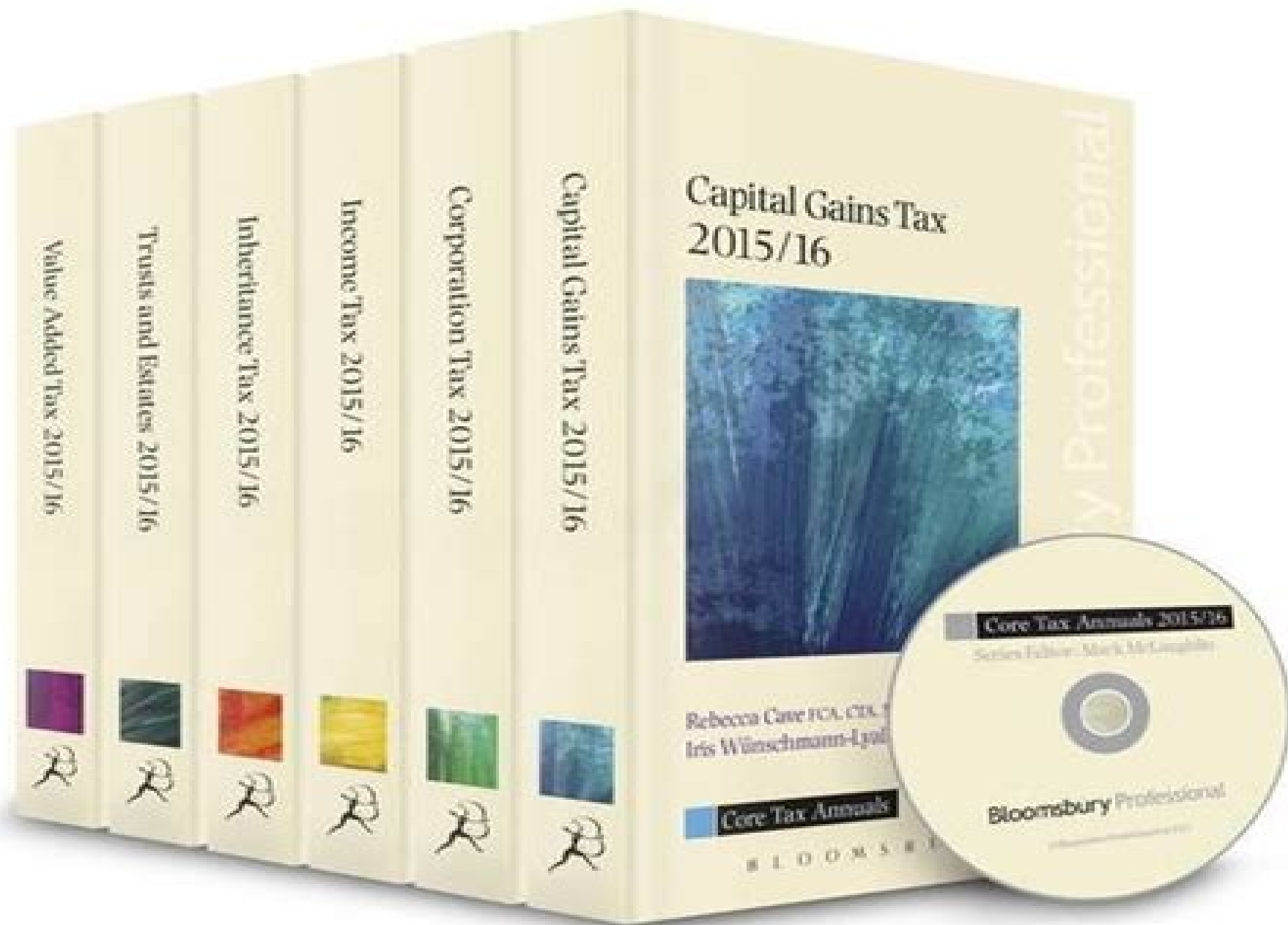




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Colorado Comprehensive Annual Financial Report for the Year Ended June 30 Colorado. State Controller's Office, 2017 **Digital Permanent Establishments** Lukas Staehli, 2020-03-09 Master's Thesis from the year 2019 in the subject Law Tax Fiscal Law grade 1 5 language English abstract The key objectives of this work is to outline the impact respectively challenges of the proposed new digital PE concept notably on Swiss headquartered MNEs and to derive recommendations and potential solutions for these enterprises from a consulting standpoint The OECD G20 as well as the Inclusive Framework on BEPS are currently aiming to find an international tax consensus for a long term solution which could have a significant impact on the international corporate tax and transfer pricing landscape The on going tax challenges raised by the digital economy emphasize the fundamental tax policy issues The new proposal by the OECD and EU would alter the current permanent establishment PE concept in a significant way and thus have a strong influence on cross border transactions of multinational enterprises MNEs These developments which relate mostly to the terms nexus and profit allocation under international tax law may affect many MNEs respectively their businesses The outcomes may reshape the international allocation of profits and losses mechanism and moreover the re allocation of those profits and losses between the residence jurisdictions and the source or market user jurisdictions While big user consumer markets are often located in emerging states which are pushing for a bigger stake in global tax revenues Switzerland as a relatively small country with stark export activities seems to be strongly affected Recommendations for multinational enterprises in light of the new permanent establishment developments under OECD G20 BEPS Action 7 and Action 1 **ProQuest Statistical Abstract of the United States 2018** ProQuest, Bernan Press, 2017-12-15 The Statistical Abstract of the United States has provided a statistical portrait of social political demographic and economic conditions of America since 1878 This 2018 edition continues

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