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complexity for intra firm transactions achieving equal weighting of the sales factor the labour factor and the asset factor in the formula application of destination based rule for attributing the sales factor and replacing the traditional permanent establishment nexus with a factor presence nexus The presentation incorporates extensive comparison between the EU s formulary apportionment tax reform option and FA systems existing in the United States US at state level including reference to relevant US case law and legislation As a possible option to address the problem of base erosion and profit shifting BEPS formulary apportionment is gaining increasing acceptance and attention This book will prove invaluable to taxation authorities tax practitioners and scholars in its deeply informed and systematic guidance on good practices and prevention of problematic experiences in establishing and implementing an effective and market neutral FA system Fulfilling the Pledge Roger C. Hartley, 2024-02-13 An insightful and evidence based assessment of our urgent need to enact labor law reform and how to achieve it Millions of non union workers want unionization but our current labor management relations law conspires to deny them meaningful opportunities to secure collective workplace representation The resulting low rates of collective bargaining impose economic political and social costs on us all In Fulfilling the Pledge Roger Hartley addresses the plight of American workers who face a grim uncertain future as the digital workplace reshapes the hierarchical post World War II industrial relations system that once gave workers a voice Through empirical evidence and the lens of law and policy Hartley examines what industrial sociologists call the chronic representation gap and clarifies how a wide ranging movement could build a vocal constituency for the congressional enactment of labor law reform The pledge made in the 1935 National Labor Relations Act to encourage establishment of industrial democracy where workers possess a voice in their places of work remains unfulfilled Speaking to policymakers scholars historians and the average citizen Fulfilling the Pledge makes a compelling case for collective workplace representation that serves the greater good even as American labor relations law continues to undermine collective bargaining by workers and becomes an increasingly significant political and social issue

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