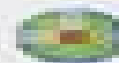


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the incentive for multinationals to shift reported income to low tax locations reducing the tax system's complexity and the administrative burden it imposes on firms eliminating transfer pricing complexity for intra firm transactions achieving equal 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

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