

A woman with long blonde hair, wearing a dark blue business suit, is shown in profile from the chest up. She is holding a mobile phone to her ear with her right hand. The background is a large digital display board showing various financial numbers in different colors (yellow, green, red, blue). The numbers include 17.00, 17.50, 17.63, +1.19, 57.17, 57.18, 60.02, +3.18, 16.04, 16.15, 16.99, 0., 67.19, 67.25, 67.6, and 0.28. The text 'Motif Investing Review' is overlaid in large white font, followed by 'Affordable Diversification' in a slightly smaller white font.

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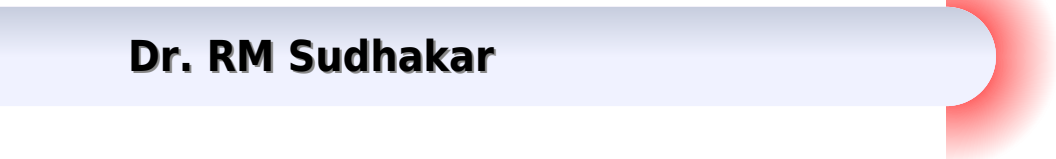
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of relevant sources including international instruments domestic tax legislation administrative practice international case law and the writings of highly qualified publicists the author fully addresses the following aspects of the subject the definition functions legal form governance home State tax status etc of sovereign wealth investors tax policy considerations and objectives i e neutrality equity and international attractiveness from a source State perspective vis vis foreign sovereign wealth investors and the potential impact of the sovereign immunity principle bilateral tax treaties and European Union law on source States ability to achieve these tax policy objectives in relation to foreign sovereign wealth investors The conceptual framework developed by the author will greatly assist source States in introducing new tax policy or in evaluating or reconsidering their existing tax policy vis vis foreign sovereign wealth investors In addition practitioners academics and home States of sovereign wealth investors will welcome this first authoritative analysis of an important but insufficiently understood subject in international tax

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