

Developing Countries, tax Treaty Shopping and the Global Minimum Tax



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and Arjan Lejour² 

Abstract

Analysis of the international network of double tax treaties reveals a large potential for tax avoidance. Developing countries are, on average, not more likely to suffer from tax revenue losses than other countries. Yet, this average masks the fact that several countries, such as Bangladesh, Egypt, Indonesia, Kenya, Uganda and Zambia, are vulnerable to substantial potential losses of withholding tax revenue by treaty shopping. The analysis combines tax parameters of more than a hundred countries with an algorithm from network theory, which simulates the tax minimizing behaviour of multinational enterprises. We introduce the notion of potentially aggressive tax treaties. These are the key treaties in treaty shopping routes, that may lead to substantial tax revenue losses

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Tax incentives for international profit shifting within multinational groups

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firm profits with respect to a country's corporate tax rate. In recent years globalization and increasing mobility have brought nations closer together but have also encouraged them to compete internationally over tax bases as source of government revenue. Both innovations in financial instruments and the free flow of capital across borders have facilitated tax avoidance measures of multinational operations.

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