Tax Evasion And The Rule Of Law In Latin America: The Political Culture Of Cheating And Compliance In Argentina And Chile

With the ongoing expansion of outbound foreign direct investment (FDI) in the countries representing the BRICS economic bloc (Brazil, Russia, India, China, and South Africa) – and with all of them at the same time listed among the top seven countries plagued by tax evasion and avoidance in the guise of illicit outflows – theve governments, both individually and through cooperative initiatives, have devised new international tax strategies that are proving to be of great interest and value to other countries, both developing and developed. The core of these strategies addresses the necessity of stemming the outflow of revenue while strongly supporting FDI, both inbound and outbound while complying with international obligations including those arising from human rights laws. This book is the first in-depth commentary on this new and evolving area of international tax law. The detailed analysis covers the entire ed of BRICS international tax law, considering topics such as the following: – information exchange procedures and pitfalls; – response to the OECD’s Base Erosion and Profit-Sharing (BEPS) initiative; – role of bilateral and multilateral double taxation conventions including the Multilateral Instrument and the Bilateral Investment Treaties; – thin capitalization; – transfer pricing; – controlled foreign corporation rules; – shortcomings related to authorities’ limited manpower; – international audit and investigation procedures; – the BRICS approach to residence and mandatory and binding arbitration; and – the BRICS approach to shaping the developing world’s international tax system. Notably, the author personally conducted interviews with senior international representatives of the BRICS tax authorities, as well as with leading BRICS academics and practitioners. Tax cases, together with human rights and investment cases and administrative guidelines in all five countries are also included in the analysis. The study concludes with recommendations for improving each of the ve countries’ tax law and procedures, especially in the area of dispute resolution. The author’s goal is to extend the existing body of knowledge of the BRICS’ international tax laws in order to assist in developing an understanding of the BRICS approach to dealing with evasion and avoidance: an approach which facilitates both outbound and inbound FDI, simplifies tax authority administration and establishes a basis for resolving international disputes which is compatible with sovereignty. In achieving this objective, the author has produced a major work that is of immeasurable value to tax advisers, government and governance officials, academics and researchers both in developing international taxation strategies and in helping to resolve disputes with tax authorities.

Scientific Essay from the year 2012 in the subject Law - Tax / Fiscal Law, grade: _, Jawaharlal Nehru University (Centre for Budget and Governance Accountability), course: Economics(Public Finance & Taxation), language: English, abstract: The recent verdict by Supreme Court on Vodafone case generates fresh debates on whether India needs to review her existing legal provisions particularly with respect to offshore tax laws. In this context, formal treatment and clear demarcations between tax evasion, tax avoidance and tax planning practices are imperative. The Standing Committee on Finance in its 49th Report on Direct Taxes Code bill, 2010(submitted to Parliament on 9th march, 2012) recommended Controlled Foreign Corporations (CFC) rules, Advance Pricing Agreement (APA) along with General Anti Avoidance Rule(GAAR) provision to replace the Income Tax Act, 1961 as per the International Taxation Standard and also in line with the recent Chinese Corporate Income Tax (CIT) Law introduced in 2008 to deal with offshore transactions via holding companies. Whereas introduction of GAAR is essential given the limited applications of a specific or targeted anti avoidance rule, the Committee also acknowledges the need for an appropriate Dispute Resolution Panel (DRP) as GAAR might result in a disproportionate discretionary power for the Income tax.
authority. The appropriate application of GAAR provision assumes a crucial role, in particular with countries lacking any Limitations of Benefit (LOB) clause (e.g. Mauritius) with India. Before entering into litigation, it might be beneficial to settle tax disputes through a bilateral negotiation in the form of Mutual Agreement Procedure (MAP), where tax authorities of the respective countries negotiate to settle disputes in a cordial manner.

An inherently interdisciplinary subject, tax avoidance has attracted growing interest of scholars in many fields. No longer limited to law and accounting, research increasingly has been conducted from other perspectives, such as anthropology, business ethics, corporate social responsibility, and economic psychology. This was recently stimulated by politicians, mass media, and the public focusing on tax avoidance after the global financial and economic crisis put a squeeze on private and public finances. New challenges were posed by changing definitions and controversies in the interpretation of tax avoidance concept, as well as a host of new rules and policies that need to be fully understood. This collection provides a comprehensive guide to students and academics on the subjects of tax avoidance from an interdisciplinary perspective, exploring the areas of accounting, law, economics, psychology, and sociology. It covers global as well as regional issues, presents a discussion of the definition, legality, morality, and psychology of tax avoidance, and provides guidance on measurement of economic effect of tax avoidance activities. With a truly international selection of authors from the UK, North America, Africa, Asia, Australasia, Middle East, and continental Europe, with well-known experts and rising stars of the field, the contributors cover the entire terrain of this important topic. The Routledge Companion to Tax Avoidance Research is a ground-breaking attempt to bring together scholarly research in tax avoidance, offering rigorous academic analysis of an important and hotly debated issue in a structured and balanced way. This dissertation analyzes the optimal mix of direct and indirect taxes in an economy with multiple tax collecting authorities when both the taxes are subject to evasion and to what extent the tax compliance behavior of individuals in the United States are persistent and spatially dependent. Essay I derives and provides an intuitive interpretation of: (i) impact of the changes in the government instruments on tax evasion by firms, the expected prices they charge, and the expected tax rates they face; (ii) a generalized version of Ramsey rule for optimal commodity taxation which accounts for income tax evasion from either or both the tax authorities; (iii) generalized formulae for the optimal income tax rate for each of the tax authorities; and (iv) the tradeoff between optimal tax rates and audit probabilities for each of the tax authorities. It also re-examines controversies surrounding the uniform income taxes and the differentiated commodity taxes, and investigates how income tax evasion affects the progressivity of the income tax rates. It concludes that whether or not tax evasion calls for reductions in the optimal income tax rates hinges on how tax evasion and the associated concealment costs vary across individual taxpayers. Essay II introduces the twin issues of spatiality and persistence in the individual income tax evasion. While the issue of persistence arises through accumulated learning over time, spatiality arises for several reasons. Some these include the exchange of information between taxpayers; the social norm of tax compliance: an individual would comply if everybody in the society complies and vice versa; individuals faced with dynamic stochastic decision problems that pose immense computational challenges may simply look to others to infer satisfactory policies and interpersonal dependence works through learning by imitating rather than learning by doing. State-level annual per return evasion of individual income tax and related data were used to examine the above hypotheses and found supports for both of them in the individual income tax evasion in the United States.

The tax system is of central importance in democracies like Brazil and United Kingdom, and certain values linked to equity, fairness, and the rule of law must be respected in distinguishing between tax avoidance and tax evasion. The faint border between the legal and illegal will be
analyzed under the legislation, jurisprudence and doctrine of Brazil and United Kingdom. Also, will be examined the mechanisms utilized by Brazil and United Kingdom in order to protected themselves against lawful man oeuvres that seek the reduction of tax. This thesis, entitled "Abuse under the Merger Directive - A different approach to the concept of 'valid commercial reasons'”, deals with the issue of tax avoidance within the scope of the Merger Directive, where the Author attempts to determine the concept of ‘abuse’ in the context of EU cross-border restructuring transactions and deal with some practical issues arising from the application of the Merger Directive's anti-abuse provision. In order to reach the conclusions sought by the Author, a first analysis regarding the importance of 'abuse' in the tax field and the financial, social and legislative consequences of these conducts driven by tax avoidance or tax evasion purposes will be undertaken. Terminological issues concerning the meaning of the concepts of tax mitigation, 'tax evasion', 'tax fraud' and 'tax avoidance' and limitations to the application of domestic anti-abuse previsions will also be addressed. This study then analyses the requirements for the application of the Merger Directive and the underlying purpose for the tax deferral system, followed by a critical review of the ECJ's case-law on the Merger Directive's anti-abuse rule. The Author then determines the scope of the said rule, through the establishment of general criteria for the finding of 'valid commercial reasons', as well as criteria for the application of presumptions of abuse. Finally, this thesis approaches several practical issues arising from the application of article 15 (1) (a) of the Merger Directive, namely whether Member-States are entitled to partially apply the tax deferral system, if there is a connection between qualifying transactions and the maintenance of the holding period for the purposes of the Parent- Subsidiary Directive, whether Member-States are also entitled to apply irrebuttable presumptions of 'abuse' and what may be the consequences for the concept of 'abuse' deriving from the last recommendations of the Commission. Key words: Merger Directive; tax avoidance; abuse; restructurings; reorganizations. This book provides a concise, practical guide to the European Union’s Anti-Tax Avoidance Directive (ATAD). Presenting unique insights into the ATAD's five specific anti-avoidance rules, its chapters explain the background of those rules, the directive’s interactions with relevant jurisprudence, and the challenges posed to the ATAD’s interpretation and implementation in domestic law. Tax Evasion and the Rule of Law in Latin AmericaThe Political Culture of Cheating and Compliance in Argentina and Chile

This book explores the interaction between business and the system of taxation in Greece, from the mid-1950s up to 2008, the year that marked the eve of the economic crisis the country faced in the aftermath of the international financial crisis of 2007. The evidence presented confirms William Baumol’s point about how taxation affects entrepreneurship. That is, it is shown that Baumol was right when indicating that problematic tax rules can lead to unproductive forms of entrepreneurship, such as tax evasion. However, the focus here is on aspects of the system of taxation that Baumol's model, examining solely tax rates and levels of taxation, neglected. This book shows that, as far as Greek entrepreneurship is concerned, the adverse effects of the system of taxation came mostly from a series of issues that increased its perceived unfairness and illegitimacy. The way that the tax system functioned also increased uncertainty, which was anything but beneficial for investing in business. This book contributes to the current debates about the Greek economy and the causes of the crisis affecting the country. In this respect, it also throws light on the big issue of tax
evasion burdening the country's fiscal system. However, the research also belongs to the wider literature examining entrepreneurship from a business history perspective, to that focusing on the relation between entrepreneurship and institutions, to the debates regarding the ways entrepreneurship is affected by the socio-political and economic environment but also to institutional analyses about taxation.

High Net Worth Individuals (HNWIs) pose significant challenges to tax administrations due to the complexity of their affairs, their revenue contribution, the opportunity for aggressive tax planning, and the impact of their compliance behaviour on ...

These are the papers from the 2014 Cambridge Tax Law History Conference revised and reviewed for publication. The papers fall within six basic themes. Two papers focus on colonialism and empire dealing with early taxation in colonial New Zealand and New South Wales. Two papers deal with fiscal federalism; one on Australia in the first half of the twentieth century and the other with goods and services taxation in China. Another two papers are international in character; one considers development of the first Australia-United States tax treaty and the other development of the first League of Nations model tax treaties. Four papers focus on UK income tax; one on source, another on retention at source, a third on the use of finance bills and the fourth on establishment of the Board of Referees. Three papers deal with tax and status; one with the tax profession, another with the medical profession and a third with aristocrats. The final three papers deal with tax theorists, one with David Hume, another focused on capital transfer tax scholarship and a final paper on the tax state in the global era.

This book provides a comprehensive analysis of the Organisation for Economic Cooperation and Development’s (OECD) war on offshore tax evasion. The authors explain the new emerging regulatory regimes on the global exchange of information to combat offshore tax evasion and analyse why Automatic Exchange of Information (AEOI) is not a “magic bullet” solution. Chapters include coverage of the Foreign Account Tax Compliance Act (FATCA), AEOI and the Common Reporting Standards (CRS), and the unprecedented extra-territorial enforcement by the United States of its tax and reporting laws, including the FBAR provisions of the Bank Secrecy Act. These new legal regimes directly impact nearly all financial institutions and financial service providers in the U.S., U.K., EU, Canada, and each of the 132 member jurisdictions of the OECD’s Global Forum, as well as 8 million U.S. expats. In light of The Panama Papers, this book offers a timely and valuable contribution on the prevalence and costs of international tax evasion for the global financial community, policy-makers, and practitioners alike.

The topics of double non-taxation and hybrid entities have acquired a particular importance in a context where transformations within the tax world seem to be leading to an international commitment most materially manifested in the
OECD Base Erosion and Profit Shifting (BEPS) project. In what is the first systematic in-depth critique of the BEPS Action Plan 2 with regard to hybrid entities, this timely book provides a critical review of the OECD’s approach and proposes a deeply informed alternative method based on the tax policy aims of simplicity, coherence and ease of administration. The author analyses the interaction between the double non-taxation outcome and the use of hybrid entities in an approach not strictly linked to any specific tax jurisdiction. To this end, the analysis includes case studies and examples from a range of jurisdictions emphasizing the international tax context, including the application of tax treaties. Among the seminal matters covered are the following: – foundations of the concepts of double non-taxation and hybrid entities, absent of the specific limitations of domestic tax legislation; – extensive analysis based on the rules of characterization of foreign entities for tax purposes in the United States, Spain, Denmark and Germany, as well as on the Poland/United States and Canada/United States tax treaties; – detailed analysis on the implications of Article 1(2) OECD Model Tax Convention and Article 3(1) Multilateral Instrument, especially having in mind the position of developing (source) countries; and – EU tax law as part of the international context, including an extensive analysis on the EU Anti-Tax Avoidance Directive (ATAD) I and ATAD II. Detailed comparisons between the author’s proposal and other existing rules elucidate common points and deviations. If merely for its unparalleled clarification of the issues, this book will prove of immeasurable value to practitioners, tax authorities, policymakers and academics concerned with international tax law. Beyond that, as an authoritative guide that promises to reorient the discussion to what really matters in the debate regarding double non-taxation and hybrid entities, this analysis elaborates solutions applicable to a generality of cases worldwide, and thus hugely promotes the urgent quest for alternative solutions.

The Major Developments in Tax Policy Steadily increasing globalization as well as the financial and economic crisis have brought major challenges for states in ensuring budgetary consolidation while maintaining sustainable economic growth. These developments have not only influenced political and economic discussions in the 21st century, but also raise new questions on the role of taxation in the economic policy environment. National taxation systems worldwide are subject to significant changes and it is assumed that they will develop in a more co-operative way in the near future. This book aims at identifying the major developments in tax policy in the 21st century on a national as well as on an international level and gives an in-depth analysis of the challenges and risks, but also of the opportunities connected to these developments. It covers numerous and discrete issues ranging from challenges in the VAT/GST area, the taxation of the financial sector, the fight against aggressive tax planning, tax abuse and tax evasion, tax integration within the EU, the development of transfer pricing rules, the increasing role of co-operative compliance and good governance and the changing tax policies of developing and newly industrialized countries. The contributions in this book build upon a legal
comparison of the national tax systems in the relevant fields, propose tax policy solutions where required and give ideas on how to go forward.

Analysis of the different approaches adopted by the tax authorities of the principal, developed countries.

The fallout from the financial crisis of 2007-8, HSBC Suisse in 2015, and the Panama Papers in 2016 has generated calls for far more vigorous and punitive responses to tax evasion and greater international co-operation against mechanisms for giving anonymity to the ownership of property. One mechanism to ensure compliance is the use of the criminal justice system. The announcement in 2013 by the then Director of Public Prosecutions, Keir Starmer, of a policy of increasing rates of prosecution for tax evasion raised squarely the issue of whether increased involvement of criminal law and criminal justice in tax evasion would be justifiable or not. The relationship between tax evasion and the proceeds of crime is taking on increasing importance: treating the 'proceeds of criminal tax evasion' as falling within the 'proceeds of crime' regime inevitably expands the scope of both. In this book, Peter Alldridge considers the development of the offences and the relationship between tax evasion offences and other criminal offences; the relevant rules of evidence; prosecution structures, decision-making processes, and alternatives to prosecution. Specific topics include offshore evasion and the relationship of tax evasion with other crimes and aspects of the criminal justice system. A topical and lively discussion of a heated debate.

First published in 2017, Fighting Tax Crime - The Ten Global Principles is the first comprehensive guide to fighting tax crimes. It sets out ten essential principles covering the legal, institutional, administrative, and operational aspects necessary for developing an efficient and effective system for identifying, investigating and prosecuting tax crimes, while respecting the rights of accused taxpayers.

Collection of articles by various authors on legal, moral and economic issues of tax avoidance, and tax evasion.

Few aspects of revenue law generate stronger feelings than the exercise of discretionary power by tax administrations. A delicate balance often needs to be struck between the legitimate needs of revenue authorities and the equally legitimate interests and rights of taxpayers. On the one hand, the executive and administration need to have sufficient capacity to apply the law; on the other, there is a need to maintain the principle of the rule of law that it is the elected legislature, and not the executive or tax administration, that establishes tax burdens. The chapters in this volume explore that delicate balance. The Delicate Balance - Tax, Discretion and the Rule of Law considers the critical questions that arise from the intersections of tax, discretion and the rule of law in modern common and civil law jurisdictions: What do we mean by tax discretion and how does it vary in conceptual and practical terms in different tax regimes? -What role should discretion play in tax systems that operate under the rule of law and how large should that role be? -What are the legal, political,
institutional and other constraints that can prevent abuse of discretion? -To what extent can, and should, the legislature safely delegate discretionary powers to tax administrations? Many recently democratized countries in Central and Eastern Europe, having escaped from communist rule and planned economies, face pressing problems related to the notions of tax evasion, trust and state capacities. Tax morale in changing political and economic contexts is of crucial importance. This raises a series of questions: What are the conditions under which people agree to pay taxes? Why do people avoid taxes? To what extent do the reasons for tax evasion vary from one region to another? The authors of this volume address these questions and try to assess the progress which has been made in Central and Eastern Europe with regard to improving tax morale through tax reforms and strengthening of extractive state capacities. A main insight is the complex causal relationship between the quality of fiscal institutions and tax morale. In addition, huge differences between countries of the former Soviet Union and central European countries, which are now members of the EU, can be observed not only at the level of democratic governance, of state capacities and the structures of trust, but also with regard to tax morale. Few tasks are as crucial for the future of democracy in Latin America&—and, indeed, in other underdeveloped areas of the world&—as strengthening the rule of law and reforming the system of taxation. In this book, Marcelo Bergman shows how success in getting citizens to pay their taxes is related intimately to the social norms that undergird the rule of law. The threat of legal sanctions is itself insufficient to motivate compliance, he argues. That kind of deterrence works best when citizens already have other reasons to want to comply, based on their beliefs about what is fair and about how their fellow citizens are behaving. The problem of &"free riding,&" which arises when cheaters can count on enough suckers to pay their taxes so they can avoid doing so and still benefit from the government&’s supply of public goods, cannot be reversed just by stringent law, because the success of governmental enforcement ultimately depends on the social equilibrium that predominates in each country. Culture and state effectiveness are inherently linked. Using a wealth of new data drawn from his own multidimensional research involving game theory, statistical models, surveys, and simulations, Bergman compares Argentina and Chile to show how, in two societies that otherwise share much in common, the differing traditions of rule of law explain why so many citizens evade paying taxes in Argentina&—and why, in Chile, most citizens comply with the law. In the concluding chapter, he draws implications for public policy from the empirical findings and generalizes his argument to other societies in Africa, Asia, and Eastern Europe. Combating Fiscal Fraud and Empowering Regulators analyzes the impact of new international tax regulations on the scope and scale of tax evasion, tax avoidance, and money laundering Following each Member State's need to rebuild a strong and stable economy after the 2007 financial crisis, the European Union (EU) has
developed a robust new transparency framework with binding anti-abuse measures and stronger instruments to challenge external threats of base erosion. This is the first and only book to provide a complete detailed analysis of the Anti-Tax Avoidance Package and other recent and ongoing European actions taken in direct taxation. With contributions from both prominent tax academics and Spain’s delegates to the European meetings where these rules are debated and promulgated, the book covers such issues and topics as the following: – the development of the EU Strategy towards Aggressive Tax Planning; – recent tax-related jurisprudence of the European Court of Justice; – the Anti-Tax Avoidance Directive; – tax treaties and non-tax treaties with tax consequences both between Member States and between Member States and third countries; – code of conduct for business taxation; – automatic exchange of information; – country-by-country reporting; – arbitration in tax matters; – external strategy for effective taxation regarding non-EU countries; – competition and state aid developments in direct taxation; – the Common Consolidated Tax Base; and – digital significant presence and permanent establishment. As the EU pursues its ambitious tax agenda, taxation's contribution to EU growth and competitiveness and its part in relations with the rest of the world will come into ever clearer focus. In addition to its insights into these trends, the book’s unparalleled practical information and analysis will be of great value to tax practitioners dealing with investment analysis, tax planning schemes, and other features of the current international tax landscape.

This publication contains the following four parts: A model Competent Authority Agreement (CAA) for the automatic exchange of CRS information; the Common Reporting Standard; the Commentaries on the CAA and the CRS; and the CRS XML Schema User Guide. Dated March 2011. A supporting document for the Budget 2011 (HC 836, ISBN 9780102971033)

This action plan, created in response to a request by the G20, identifies a set of domestic and international actions to address the problems of base erosion and profit sharing.

This book integrates legal, economic, and administrative materials about value added tax. Its principal purpose is to provide comprehensive teaching tools - laws, cases, analytical exercises, and questions drawn from the experience of countries and organizations from all areas of the world. It also serves as a resource for tax practitioners and government officials that must grapple with issues under their VAT or their prospective VAT. The comparative presentation of this volume offers an analysis of policy issues relating to tax structure and tax base as well as insights into how cases arising out of VAT disputes have been resolved. The authors have expanded the coverage to include new VAT related developments in Europe, Asia, Africa and Australia. A chapter on financial services has been added as well as an analysis of significant new cases.

The structure of the tax system is important in developing a workable environment capable of diminishing both the extent and the opportunities for tax avoidance and evasion. Generally, taxpayers dislike paying taxes, which results in them colluding against the government and this impacts negatively on the economy. Efforts by the legislature to curb tax avoidance with the introduction of various forms of antiavoidance techniques have, however, contributed to the complexity of tax legislation. The complexity of tax legislation, as well as higher marginal tax rates, leads to higher incidences of tax avoidance, and at times, tax evasion. Uncertainty, complexity and confusion also provide the breeding ground for tax avoidance and evasion. The South African GAAR is a concoction of GAARs from different parts of the world. This is in a bid to ensure that anti-avoidance techniques in South Africa are in line with international trends on anti-avoidance legislation. But has this purpose really been achieved? A comparative study of the South African anti-avoidance legislation with that of other countries is therefore necessary to determine how it stands on a global scale as a deterrent to tax avoidance. For the purposes of this paper,
only the Canadian, Australian and United Kingdom GAARs will be discussed. Unfortunately, it seems no jurisdiction has found a perfect solution, and the use of GAARs in varying forms has had mixed success. Copyright.

Seminar paper from the year 2017 in the subject Business economics - Accounting and Taxes, grade: 71.00, University of Westminster (Westminster Business School), course: MSc in Accounting and Finance, language: English, abstract: It is important that taxpayers are treated in a fair manner. Tax avoidance enables some taxpayers to gain an unfair advantage. This harms governments and economies, by causing an erosion in the tax base and increasing the public finance deficit; individual taxpayers, who bear a greater share of the tax burden; and businesses, which are put at a competitive disadvantage compared to multinational enterprises (MNEs) that can shift their profits overseas. This makes tax avoidance a very significant part of the UK tax gap.

"Compares the tax systems in Argentina and Chile. Examines differences in law abidance between the two countries and the effectiveness of legal enforcement"--Provided by publisher.

Written by Ved P. Gandhi, Liam P. Ebrill, George A. Mackenzie, Luis Mañas-Antón, Jitendra R. Modi, Somchai Richupan, Fernando Sanchez-Ugarte, and Parthasarathi Shome, this book contains 12 articles. It examines the relevance to developing countries of the tax policy recommendations of supply-side economists and attempts to delineate policy guidelines to ensure that fiscal management enhances rather than inhibits growth and efficiency in the wider economy.

This article discusses Germany’s new royalties barrier rule, which limits the deduction of royalties and similar expenses paid by a German corporation to a foreign related entity for the use of intellectual property when the taxation of those royalties in the licensor's hands is subject to a patent box or is otherwise inadequate.

This volume provides a fascinating look at the anti-tax avoidance strategies employed by more than fifteen countries in eastern and western Europe, Canada, the Pacific Rim, Asia, Africa, and the United States. It surveys the similarities and differences in anti-avoidance regimes and contains detailed chapters for each country surveying the moral and legal dimensions of the problem. The proliferation of tax avoidance schemes in recent years signals the global dimensions of a problem presenting a serious challenge to the effective administration of tax laws. Tax avoidance involves unacceptable manipulation of the law to obtain a tax advantage. These transactions support wasteful behavior in which corporations enter into elaborate, circuitous arrangements solely to minimize tax liability. It frustrates the ability of governments to collect sufficient revenue to provide essential public goods and services. Avoidance of duly enacted provisions (or manipulation to secure tax benefits unintended by the legislature) poses a threat to the effective operation of a free society for the benefit of a small group of members who seek the privilege of shifting their tax burden onto others merely to compete in the world of commerce. In a world in which world treasuries struggle for the resources to battle terrorist threats and to secure a decent standard of living for constituents tax avoidance can bring economies close to the edge of sustainability. As tax avoidance is one of the top concerns of most nations, the importance of this work cannot be overstated.
This book contains, in a slightly edited version, the papers given at a conference organized by Associated Business Programmes in Amsterdam in November 1973.

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