

Digital Economy

- some thoughts



The 5th IMF-Japan High-Level Tax Conference for Asian Countries
April 21-23, 2014

Issue No. 1 – Permanent Establishment



Issue No. 1 – Permanent Establishment contd...



Issue No. 1 – Permanent Establishment contd...



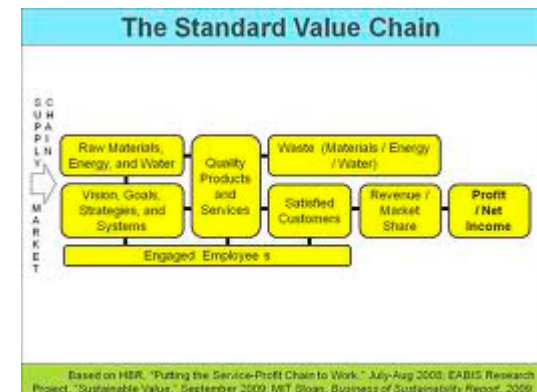
Issue No. 2 – Resident State vs Source State



Issue No. 2 – Resident State vs Source State contd...



Issue No. 3 – Income linked to value creation



Issue No. 3 – Income linked to value creation contd...



Issue No. 4 – withholding taxes an effective tool?



Issue No. 5 – who should take the lead?



THANK YOU