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An Analysis of OECD's Role in Global Digital Tax Standards

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ABSTRACT

Traditional tax structures face difficulties from global economic digitalisation. The OECD has shaped worldwide tax policy, notably digital taxes. This document discusses the OECD's Base Erosion and Profit Shifting (BEPS) framework and Two-Pillar Solution to set fair and effective digital tax rules. The research shows how these metrics affect multinational firms, national tax policy, and the global economy. We also explore the long-term impact of these tax policies on investment decisions, tax collections, and economic equality among nations. It discusses implementation issues such compliance difficulties, tax haven opposition, and administrative complications in developed and developing nations. The study also examines how regional tax regulations affect the OECD's digital tax initiatives and how blockchain and AI might ensure tax compliance and transparency. This paper examines OECD policies and their worldwide impact on international taxes in the digital era. Destination-based cash flow taxes and digital transaction levies are also examined to see whether they can combat tax evasion. It also examines digital tax policies' geopolitical effects on international trade and the possibility for unilateral tax measures to cause diplomatic problems. Our study examines the socioeconomic effects of digital taxes on consumer pricing, corporate innovation, and digital market competition. The article provides a comprehensive view of global digital tax policy challenges by examining the views of governments, multinational corporations, small firms, and consumers. This study shows that international collaboration is needed to adapt tax legislation to the digital economy while preserving economic sustainability and justice by analysing worldwide taxation patterns.

***Keywords**: OECD, Digital Tax, BEPS, Multinational Corporations, Economic Development, Tax Reforms.*

I. INTRODUCTION

The rapid advancement of digital technology and the resulting revolution in international trade have significantly altered traditional company strategies. Multinational technology corporations may now operate in several countries and make sizable profits without needing a strong physical

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presence in those areas thanks to the digital economy. Conventional tax structures, which were initially created to control physical enterprises with distinct geographic footprints, have faced significant issues as a result of this change. Because of this, many current tax rules have found it difficult to adequately account for the economic activity of digital businesses, raising worries about tax evasion, profit shifting, and government revenue losses. OECD[2] has taken the initiative to create a thorough international framework for digital taxes in response to these issues. Its objective is to ensure that global digital corporations pay their fair share of taxes in the countries in which they generate revenue, rather than only in the jurisdictions where they have established their tax structures or headquarters.

The goals of the OECD's programs are to minimise chances for tax evasion through aggressive corporate tax planning methods, prevent erosion of the tax base, and promote fair tax laws that reflect the contemporary economic environment. The subject of digital taxes has become a crucial area for policy reform as governments attempt to modernise their tax systems to reflect the evolving nature of business. Disparities in tax collection have resulted from the shift from physical to digital trade, with certain governments finding it difficult to levy sufficient taxes on digital enterprises that generate money. In order to reduce their tax obligations, many multinational firms deliberately take advantage of gaps in international tax laws, frequently moving their earnings to countries with low or no taxes. As a result, there is a growing movement for tax reforms that prioritise openness, equity, and economic efficiency. The BEPS[3] project and the historic global digital tax framework, which comprises Pillar One and Pillar Two recommendations, are two of the steps the OECD has launched to address these inequities.

By ensuring that corporation taxes is in line with the actual economic activity occurring inside a jurisdiction, these policies seek to more fairly distribute taxing powers across nations. The OECD aims to develop a sustainable and equitable digital tax system that strikes a balance between the interests of governments, corporations, and consumers by promoting international collaboration and implementing uniform tax regulations. The OECD's involvement in tackling the taxes issues brought on by the digital economy is examined in this study. It looks at the group's attempts to influence worldwide digital tax norms, how these changes may affect multinational tech firms, and how they could affect international tax competitiveness. This study intends to offer insights into the future course of international tax laws and their wider economic ramifications by examining the current advancements in digital taxes.

[2] The Organisation for Economic Co-operation and Development.
[3] Base Erosion and Profit Shifting.

II. THE OECD AND DIGITAL TAXATION

(A) The Base Erosion and Profit Shifting (BEPS) Initiative

Through its BEPS initiative in particular, the OECD has been instrumental in tackling concerns pertaining to digital taxation. The BEPS project was started in 2013 with the goal of addressing and reducing the many tax evasion tactics used by multinational firms. By moving earnings to jurisdictions with little or no taxes, these corporations frequently take advantage of disparities in national tax rules, undermining the revenue bases of nations with higher tax rates. Action 1 specifically addressed the difficulties brought forth by digitisation within the larger BEPS framework. This move emphasised the need to update international tax laws to reflect the quickly changing digital economy. The BEPS effort is supported by a number of important goals. Its primary goal is to increase business financial reporting and taxation transparency, which will assist tax authorities better comprehend the true sources of economic value creation.

Second, it aims to eradicate false profit shifting, a behaviour that skews the real image of a business's financial operations and compromises the tax system's fairness. Third, it aims to ensure that income is subject to taxation in the nations where the economic activity that generates it takes place. Several policy initiatives have been adopted as part of the BEPS framework. One measure to improve tax transparency is CbCR,[4] which requires big multinational firms to submit comprehensive financial data in every jurisdiction in which they do business. A number of anti-abuse regulations have also been put in place to stop businesses from taking advantage of tax system flaws to unfairly transfer earnings. Together, these actions address some of the particular difficulties brought on by digitisation and help create a more open and equitable international tax system.

(B) The Two-Pillar Solution

In 2021, the OECD put up what is now referred to as the Two-Pillar Solution in response to the increasing complexity surrounding the taxation of digital services. This all-encompassing strategy was created in response to growing concerns throughout the world that the contemporary digital economy was not being sufficiently addressed by existing taxation systems. The construction of the Two-Pillar Solution is as follows:

a. Pillar One: Reallocation of Taxing Rights

The OECD's Two-Pillar Solution, which aims to solve the difficulties in taxing multinational corporations (MNEs) in the digital economy, includes Pillar One as a fundamental element.

[4] country-by-country reporting.

Businesses are mostly taxed in the countries where they have offices, factories, or other physical assets since corporation tax regimes have always been based on physical presence. But in the digital age, a lot of consumer-facing and technology-driven businesses work internationally without having a sizable physical presence in the nations where they make a lot of money. Due to the resulting tax inequities, several multinational digital corporations have been able to transfer their earnings to countries with lower tax rates, therefore lowering their overall tax liability. By redistributing a share of taxation rights to market jurisdictions that is, to nations where digital enterprises interact with consumers, create economic value, and earn significant profits even if they do not have a physical presence there, Pillar One seeks to address this imbalance. In the nations where its users and clients live, the major objective is to ensure that big consumer-focused and digital companies—like social media networks, online advertising platforms, and e-commerce platforms—pay their fair amount of taxes.

A new framework is presented under Pillar One to specify the percentage of worldwide profits that ought to be taxable in market jurisdictions. This includes:

1. **Identifying In-Scope Companies:** Large multinational corporations are the main target of Pillar One, especially those whose yearly worldwide sales surpass a certain level (e.g., €20 billion initially, with potential decreases in future). This category includes businesses that make a sizable profit from international digital services and customer contacts.

2. **Defining Market Jurisdictions:** Countries have the right to tax a portion of a business's income if it has a sizable user base, makes a sizable amount of money, or interacts with customers in a meaningful way. This guarantees that digital companies pay taxes according to their financial existence rather than their physical location.

3. **Reallocating a Portion of Global Profits:** Instead of merely taxing companies in the country where they were incorporated or where they declare profits, market jurisdictions also get a portion of residual earnings, or profits beyond a specific profitability threshold. The purpose of this reallocation is to represent the true economic contributions made by digital businesses across different geographical areas.

4. **Preventing Double Taxation:** Pillar One implementation requires measures to stop businesses from paying taxes on the same revenue more than once. This entails cooperation between market jurisdictions and home nations, where companies have their headquarters, with credits and exemptions offered to avoid imposing undue taxes.

Through the implementation of these reforms, Pillar One seeks to modernise the global tax

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system and align it with the realities of the digital economy. By keeping multinational firms from disproportionately profiting from tax breaks and allowing governments to collect money from businesses that capitalise on local markets, the strategy fosters equity. Implementing Pillar One is a big step towards a more sustainable and fair international tax system, even if it comes with difficulties including getting nations to agree, creating precise guidelines for revenue distribution, and guaranteeing compliance.

b. Pillar Two: Implementing a Global Minimum Tax

Pillar Two improves the first pillar by preventing tax evasion and ensuring that MNCs[5] pay their fair share of taxes wherever they conduct business by instituting a global minimum corporate tax rate of 15%. Pillar Two's main goal is to lessen the motivation for MNCs to use aggressive tax planning techniques including profit shifting, which entails moving revenues to countries with low or no taxes in order to minimise their overall tax obligation.

(C) Addressing Tax Competition and Profit Shifting

For decades, countries have engaged in tax competition to attract multinational firms by offering financial advantages such as low corporate tax rates. This has benefited certain economies, but it has also resulted in BEPS[6], as large corporations shift their profits to nations with little or no taxes, depriving governments of a major portion of their tax revenue. By establishing a global minimum tax rate of 15%, Pillar Two seeks to address this problem by ensuring that multinational firms pay a minimum amount of taxes, irrespective of where their revenue is reported.

a. Key Components of Pillar Two

1. **Global Anti-Base Erosion (GloBE) Rules:**
   - The structure consists of rules that ensure multinational firms with annual sales above €750 million pay taxes at a minimum effective rate of 15% on their global revenue.
   - These regulations prohibit businesses from moving earnings to tax havens in order to lower their overall tax obligation, and they are applicable in all jurisdictions where an MNC conducts business.
2. **Income Inclusion Rule (IIR):**
   - According to this law, parent businesses of multinational corporations that have

[5] Multinational Corporations.
[6] Base Erosion and Profit Shifting.

subsidiaries in foreign jurisdictions that are taxed below the 15% level must pay a top-up tax.

- It eliminates the advantages of profit shifting by guaranteeing that profits in low-tax nations be taxed at the parent business level at the lowest possible rate.

3. **Undertaxed Payments Rule (UTPR):**
   - By enabling nations to refuse deductions or levy extra taxes on intragroup transfers that profit from low-taxed income elsewhere, this clause serves as a safeguard.
   - It guarantees that governments can still impose the minimum tax in other ways, even if an MNC is set up to circumvent the Income Inclusion Rule.
4. **Subject-to-Tax Rule (STTR):**
   - Because it permits them to levy withholding taxes on specific cross-border transfers that would otherwise be subject to lower rates of taxation in the receiving jurisdiction, this provision is especially advantageous for developing nations.
   - By guaranteeing that payments like royalties and interest are taxed correctly, it offers extra protection against tax evasion.

(D) Impact and Significance of the Global Minimum Tax

Since Pillar Two expressly opposes tax havens and detrimental tax competitiveness, it marks a significant change in the global tax environment. Among its most significant ramifications are:

- **Increased Tax Revenues for Governments:** Reducing the incentives for companies to shift their earnings abroad will allow nations to collect more corporation tax income. According to OECD projections, the global minimum tax may result in an extra $150 billion in tax income per year.
- **Greater Tax Fairness:** Pillar Two creates a more equal tax system by guaranteeing that all multinational corporations pay a minimum amount of taxes. This lessens the difference between high-tax and low-tax nations.
- **Reduced Reliance on Tax Havens:** Global corporate tax planning methods may need to change if nations with nearly zero corporation tax rates become less alluring as places to move profits.
- **Level Playing Field for Businesses:** Traditional high-tax countries will no longer put

businesses at a competitive disadvantage when compared to those who profit from ultra-low tax regimes.

(E) Challenges and Implementation Hurdles

Although many people believe that the global minimum tax is a step towards improved economic stability and tax justice, there are a number of obstacles to its implementation:

- **Achieving Global Consensus:** The plan has been opposed by several tax havens and low-tax nations, who claim it will make it more difficult for them to draw in investment.
- **Complex Compliance Requirements:** Businesses may have to deal with more administrative work when figuring out their effective tax rates in different jurisdictions.
- **Potential Loopholes:** Even with the protections provided by Pillar Two, some businesses would still try to set up their activities to reduce their tax obligations.
- **Enforcement and Coordination:** Coordination between tax authorities throughout the world and procedures for resolving potential conflicts between countries are necessary for effective enforcement.

Notwithstanding these obstacles, Pillar Two is an innovative attempt to update international tax laws, guaranteeing that multinational firms make more equitable, transparent, and stable contributions to the growth of the world economy. When properly put into practice, this framework will aid in the eradication of tax evasion tactics that have long reduced government income, fostering a more equitable approach to international taxes.

The OECD's launch of these programs shows a strong commitment to establishing a more equitable, predictable, and balanced global tax environment. However, strong international collaboration is required for the Two-Pillar Solution to be implemented successfully. When implementing new tax laws, a number of legal and administrative issues come up that require cooperation from nations. This entails creating strong dispute resolution procedures, bringing local tax legislation into line with international norms, and making sure tax authorities have the tools necessary to oversee and manage compliance. Thus, the changing environment of digital taxes offers both enormous potential and difficulties, necessitating constant communication and cooperation between governments, corporations, and international organisations.

III. Impact on Multinational Corporations and National Tax Policies

National tax laws, multinational firms, and the larger international tax system are all significantly impacted by the OECD's digital tax guidelines. The purpose of these new tax laws is to provide a more equitable distribution of taxation rights across jurisdictions and to solve issues brought about by the digital economy.

(A) Implications for Multinational Corporations

Global taxation has undergone a radical change with the adoption of the OECD's digital tax framework, especially for multinational companies (MNCs) involved in the digital economy. Technologically driven businesses and major digital service providers are immediately impacted by the new framework, which includes Pillar One (reallocation of taxation rights) and Pillar Two (global minimum tax). The main organisations impacted are Google, Amazon, Facebook, and Apple (often referred to as GAFA firms), as well as other global corporations that depend on digital platforms, e-commerce, online advertising, and intangible assets.

(B) Key Challenges and Adjustments for MNCs

1. Increased Tax Liabilities and Compliance Burdens

- MNCs must review their tax planning strategies in light of the new tax responsibilities outlined in the OECD framework in order to guarantee compliance with international tax laws.
- Due to rising effective tax rates, many businesses that previously profited from aggressive profit-shifting strategies or low-tax locations would now have to pay more in taxes.
- Businesses will have to spend more money on tax reporting, auditing, and legal research in order to comply with the new regulatory framework, which will increase compliance costs.

2. Revised Profit Allocation Mechanisms

- Even if they don't have a physical presence, multinational firms must pay taxes in market jurisdictions where they generate substantial revenues according to Pillar One's profit distribution criteria.
- This implies that rather than being taxed just in the home country or in low-tax jurisdictions, a percentage of worldwide profits particularly residual profits will be redistributed to nations where users, consumers, and customers live.
- In order to comply with these new allocation criteria, companies might need to reorganise intra-group transactions and modify internal transfer pricing processes.

3. Potential Financial and Operational Restructuring

- To reduce tax risks, multinational firms will need to review their international supply

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networks, organisational designs, and financial plans.

- Certain firms can decide to move certain operations or set up new operational centres in countries that provide greater alignment with their changing tax responsibilities.
- Due to the growing importance of tax considerations in business decision-making, the OECD framework may also encourage firms to reconsider mergers, acquisitions, and joint ventures.

4. Heightened Scrutiny from Tax Authorities

- To make sure MNCs abide with the new regulations, tax authorities throughout the world are anticipated to step up their supervision and enforcement activities.
- Increased transparency requirements for multinational corporations will include disclosure of tax measures to avoid profit shifting and required country-by-country reporting (CbCR).
- Large firms should prioritise managing their tax risk since governments will probably enforce harsher fines for non-compliance.

5. Adaptation to Digital Tax Reporting Standards

- Businesses must invest in technology-driven tax reporting solutions as nations enact digital tax changes. This will ensure precise tracking of revenues, user interaction, and taxable earnings across several jurisdictions.
- Data analytics, AI-powered accounting software, and automated tax compliance systems will all be essential for effectively handling cross-border tax responsibilities.
- It will take specific knowledge and flexibility to adjust to changing legal frameworks in order to comply with various tax systems, such as OECD regulations, regional digital services taxes, and unilateral policies like France's digital services tax or India's equalisation levy.

(C) Opportunities and Strategic Adaptations for MNCs

Businesses have the chance to improve their tax planning techniques even as the OECD's tax system presents new difficulties. By actively adopting the OECD's digital tax framework, multinational firms may establish themselves as pioneers in tax transparency and corporate responsibility, strengthening their bonds with stakeholders and authorities. The complexity of tax administration can be decreased by investing in digital tax technologies, such as real-time compliance software, blockchain for financial transactions, and AI-powered tax automation.

Additionally, companies can improve their market presence while maintaining compliance with the new legislation by strategically growing their operations in high-growth jurisdictions where tax requirements are now applicable. A company's image may be enhanced by adopting fair taxation procedures, which can boost investor confidence, consumer trust, and public perception.

Multinational firms must make significant changes to their tax strategy, financial planning, and compliance initiatives as a result of the OECD's digital tax framework. Businesses that effectively adapt and make investments in compliance procedures can leverage this shift into a competitive advantage, despite the enormous obstacles posed by higher tax obligations and regulatory scrutiny. Multinational firms may promote long-term financial stability and keep their position as leaders in the digital economy by adhering to international tax norms.

(D) Implications for National Tax Policies

National tax laws throughout the world are predicted to undergo a radical change as a result of the adoption of the OECD's digital tax guidelines. Governments will need to change their domestic tax laws, improve collaboration with international tax agencies, and move away from unilateral tax policies as they adapt to this new international framework. These modifications will ensure a more consistent and well-coordinated approach to international taxes by reshaping the taxation of digital firms.

a. Key Implications for National Tax Policies

1. Encouraging Harmonization of Tax Rules

By resolving the contradictions and legal ambiguities brought forth by unilateral tax policies, the OECD's digital tax framework seeks to increase uniformity in international tax laws. Governments may reduce conflicts involving double taxation and tax evasion tactics by bringing national tax laws into line with the OECD's standards. This will also make the tax environment for multinational firms more predictable and stable. By ensuring tax harmonisation, companies may adopt a uniform strategy regardless of where they are located, which eventually increases efficiency and tax compliance.

2. Shift Away from Unilateral Taxation Measures

Unilateral DSTs[7] have been implemented in a number of nations in the past to make sure that multinational IT companies pay their fair share of taxes. For example, India placed a 2% Equalisation charge on revenue collected by international e-commerce platforms, France levied

[7] Digital Service Taxes.

a 3% charge on sales from digital services, and the UK slapped a 2% tax on the digital earnings of major software companies. However, in order to avoid double taxation disputes and conform to a globally coordinated tax policy, countries that have implemented such unilateral policies may need to phase them out progressively under the OECD framework. To minimise interruptions to national income sources and enable a seamless transition from unilateral to multilateral tax systems, this transition would need cautious legislative modifications.

3. Strengthening International Tax Cooperation

By signing additional data-sharing agreements, carrying out joint tax audits, and creating uniform tax reporting procedures, governments will need to improve cross-border tax cooperation. Tax authorities can more effectively monitor company earnings, digital transactions, and financial flows according to the OECD framework, which encourages the automated interchange of tax-related data. Coordinated tax enforcement initiatives will also be a part of strengthening cooperation, enabling nations to work together to look into and punish multinational corporations for tax evasion or non-compliance. Furthermore, heightened cooperation with global institutions like the EU[8], World Bank, and IMF[9] will be essential to the effective execution of digital tax changes.

4. Reforming Domestic Tax Laws

To conform to the OECD's global tax framework, nations will need to update their tax laws and policies. The main goals of these legislative adjustments will be to ensure equitable profit distribution among market jurisdictions, define thresholds for taxing multinational digital enterprises, and modify corporate tax structures to comply with the new digital tax rules. Ireland, Singapore, and the Cayman Islands are examples of countries with tax-friendly laws and low corporation tax rates that could have to raise their minimum corporate tax rates in order to meet Pillar Two's 15% global minimum tax requirement.

5. Potential Revenue Implications for Governments

Different countries will see varying revenue effects from the adoption of OECD digital tax regulations. Since multinational corporations would have to pay taxes in the market jurisdictions where they operate, high-tax nations like the US, France, and Germany should experience a rise in tax collections. Tax havens and low-tax nations, on the other hand, would lose their competitive advantage as businesses will no longer be able to move their earnings there to evade taxes. Meanwhile, increased tax payments from digital companies operating

[8] European Union.
[9] International Monetary Fund.

within national economies might help underdeveloped countries that now face low tax revenues.

6. Enhancing Tax Transparency and Compliance Mechanisms

More openness is emphasised by the OECD's digital tax standards, which mandate that nations make investments in digital tax infrastructure in order to efficiently monitor cross-border activities. Tax authorities will implement new reporting requirements for businesses in order to enforce these standards. These requirements include requiring large corporations to report country-by-country (CbCR), increasing the disclosure of digital revenues and user-based profits, and requiring multinational corporations operating in multiple jurisdictions to report digital taxes in real-time. To guarantee adherence to the new tax laws, governments will also need to improve tax enforcement by implementing blockchain technology, AI-driven tax monitoring systems, and sophisticated digital tracking tools.

(E) Challenges in Implementing the OECD’s Digital Tax Principles

Despite offering a clear tax reform path, the OECD's digital tax framework presents a number of practical obstacles. The global consensus may be slowed considerably if low-tax nations that depend on low corporate tax rates to draw in foreign investment oppose the 15% global minimum tax. Furthermore, some governments may find it difficult to enact domestic tax reforms because of political resistance or complicated legal issues, which might result in legislative delays and policy uncertainty. It can be difficult to strike a balance between national interests and international obligations as nations have to make sure that new tax laws promote global governance without hurting home companies or deterring investment. Stronger international legal frameworks will also be necessary for efficient enforcement and dispute resolution in order to handle cross-border tax issues and close any gaps that can allow tax evasion.

A substantial change in international taxes has occurred with the adoption of the OECD's digital tax principles, necessitating extensive adjustments to national tax laws. To comply with the OECD's recommendations, governments everywhere must modify their tax structures, improve international collaboration, and move away from unilateral taxation. Notwithstanding the difficulties, the advantages such as improved tax transparency, more equitable profit distribution, and more revenues for poorer countries outweigh the implementation's difficulties. Countries may improve global economic stability and guarantee that multinational digital companies pay their fair share of taxes by adopting harmonised tax rules.

(F) For Developing Economies:

Under the OECD's digital tax framework, developing countries—which frequently have difficulty collecting taxes from digital companies operating in their markets—may face both possibilities and difficulties. Since the transfer of taxation rights enables these economies to claim a portion of corporate profits earned inside their jurisdictions, one major advantage is the possibility for greater tax collections. Long-term growth may be promoted by using this extra tax revenue to finance economic development programs like infrastructure improvements, healthcare, education, and other public services. Governments must, however, improve their tax administration capacities by investing in digital tax infrastructure and developing knowledge of handling intricate international tax issues if the new tax regulations are to be implemented effectively.

Furthermore, a lack of funding and technological capacity may make compliance and enforcement difficult in many underdeveloped countries. To help these nations get over these challenges and take full advantage of the new global tax system, assistance from international organisations and capacity-building programs will be essential. To enable the successful implementation of the OECD's digital tax framework, governments throughout the globe will also need to embrace technology improvements in tax administration, enhance transparency, and promote international collaboration. By doing this, they may establish a more sustainable and fair global tax system that is advantageous to economies and enterprises alike.

IV. CHALLENGES AND CRITICISMS

Notwithstanding its lofty objectives, a number of obstacles prevent the OECD's digital tax efforts from being implemented smoothly and effectively. These difficulties arise from administrative, economic, and geopolitical elements that make international tax cooperation more difficult.

(A) Implementation Issues

Reaching a global agreement among countries and guaranteeing rigorous enforcement of the agreed-upon regulations are two of the main obstacles in putting the OECD's digital tax framework into practice. Different nations have different economic objectives, and because of worries about how the new tax laws may affect economic competitiveness, some jurisdictions may be hesitant to implement them. Implementation may be resisted by countries with a high concentration of digital multinational companies (MNCs) because of concern that the new tax laws would make them less desirable as a location for business. Furthermore, strong regulatory frameworks are necessary to enforce compliance in every nation, but they could be challenging to set up in some areas.

(B) Unilateral Taxation Measures

The implementation of unilateral digital tax measures by certain nations persists despite the OECD's efforts to establish a single worldwide framework, leading to conflicts and discrepancies in international tax policy. For example, digital service taxes, or DSTs, have been implemented in France and India that target huge technological companies that operate there. These policies frequently run counter to the OECD's more comprehensive framework, which might result in disagreements and punitive trade actions. Numerous internet firms impacted by these levies are based in the United States, which has expressed concerns about discrimination against American businesses. This has led to talks and, occasionally, threats of retaliation. The OECD's goal of creating a unified international tax system is undermined by the continued use of unilateral actions, which also makes international relations more difficult.

(C) Complexity and Administrative Burden

A very complicated tax system that necessitates a great deal of administrative work and coordination is introduced by the OECD's Two-Pillar Solution. In order to track and distribute tax income across various jurisdictions, new procedures must be established as part of Pillar One, which reallocates taxing rights. In a similar vein, governments must strengthen their tax enforcement capacities and set up monitoring mechanisms to stop tax evasion under Pillar Two, which imposes a 15% global minimum tax. Adhering to these complex regulations is extremely difficult for nations with little funding for tax administration. It's possible that many poor countries lack the resources, know-how, or infrastructure needed to successfully implement and enforce the new regulations. To guarantee that all countries can effectively engage in the new tax structure, international organisations and wealthier nations may need to offer technical help and capacity-building support.

(D) Profit Shifting and the Adequacy of the Minimum Tax Rate

The suitability of the suggested 15% worldwide minimum tax rate is the subject of yet another significant critique. According to some analysts, this rate could be insufficient to successfully stop multinational firms from moving profits. It's still possible for some tax havens or low-tax nations to provide incentives or loopholes, allowing businesses to keep using aggressive tax planning techniques. Although the OECD framework seeks to bridge these gaps, multinational corporations and tax advice firms may come up with new ways to take advantage of legislative inadequacies due to the dynamic nature of tax evasion techniques. Furthermore, several developing nations contend that a minimum tax rate is insufficient to guarantee equitable distribution of tax income. Since many low-income countries mostly rely on corporate tax income, they think that a higher minimum tax rate will more effectively reduce global tax disparities. In order to stop big businesses from evading taxes, they also stress the necessity of more openness and more robust anti-avoidance laws.

(E) Political and Economic Challenges

The effective implementation of the OECD's digital tax system is significantly hampered by political issues in addition to technical and legal ones. Countries have expressed differing opinions on the framework of the new tax regulations, making the negotiating process itself difficult. Some countries are concerned that larger economies may disproportionately gain from the redistribution of taxation powers under Pillar One, at the expense of smaller ones. Others contend that states may be influenced by domestic political pressures to put their own tax laws ahead of international collaboration. Furthermore, countries' propensity to enact new tax laws may be impacted by global crises like pandemics, recessions, or geopolitical conflicts as well as economic swings.

Governments may be hesitant to place new tax obligations on firms during economic downturns out of concern that doing so will impede investment and economic recovery. The worldwide tax reform process is made much more complicated by this uncertainty. Although the OECD's digital tax efforts are a big step in tackling the difficulties associated with taxing the digital economy, they are subject to criticism and substantial implementation obstacles. It is challenging to establish a smooth and efficient global tax system because of the existence of unilateral taxing measures, administrative challenges, doubts about the suitability of the minimum tax rate, and geopolitical conflicts. To guarantee that the global tax structure meets its intended objectives of efficiency, economic sustainability, and justice, addressing these issues will need ongoing international cooperation, policy improvements, and assistance for poor nations.

V. FUTURE PROSPECTS AND RECOMMENDATIONS

The successful implementation of the OECD's digital tax system and ongoing international collaboration are essential to its success. Ensuring a just and open tax system that benefits all parties governments, corporations, and consumers remains a top responsibility as digital economies develop. To improve the framework's efficacy and long-term viability, the following important suggestions might be taken into consideration:

- **Strengthening International Consensus:** The effectiveness of the OECD's digital tax regime depends on reaching a wide international agreement. In order to ensure that nations with sizable digital markets actively participate in the accord, diplomatic efforts must be directed towards promoting collaboration among all major economies. This will lessen the likelihood of unilateral tax policies that may result in trade conflicts and inefficiencies in the economy. A single, worldwide strategy will reduce regulatory arbitrage and level the playing field.

- **Ensuring Robust Enforcement Mechanisms:** To deter tax evasion and aggressive tax avoidance by multinational firms, digital tax laws must be enforced effectively. To identify and discourage profit shifting and fake base erosion tactics, governments must put in place strict monitoring mechanisms. Enforcement operations may be strengthened by actions including international cooperation in tax audits, cross-border data exchange, and the use of cutting-edge technology for compliance verification.
- **Enhancing Capacity-Building Initiatives for Developing Countries:** The lack of institutional ability and technological know-how makes it difficult for many developing countries to execute digital tax changes. These nations can gain from the OECD framework by bolstering capacity-building programs. Tax authorities in lower-income countries will be better equipped to implement and enforce digital tax laws if they have access to training programs, funding, and technological support. Ensuring equitable income distribution will support sustainable development and global economic justice.
- **Encouraging Transparency in Multinational Tax Reporting:** In order to reduce profit shifting and erosion of the tax base, transparency is essential. Enforcing standardised disclosure of comprehensive tax and financial information by multinational firms would improve accountability and discourage tax evasion. In order to guarantee that revenues, earnings, and tax payments are appropriately revealed across jurisdictions, countries ought to require public country-by-country reporting, or CbCR. Tax authorities would be able to monitor any inconsistencies and take appropriate corrective action as a result.
- **Periodic Review and Adjustment of Tax Rates:** With new business models, developing technology, and shifting consumer behaviour influencing the global economic landscape, the digital economy is continuously changing. Tax rates and regulatory frameworks should be evaluated and modified on a regular basis to ensure that digital tax policies remain effective and relevant. Policymakers may ensure fair taxation without inhibiting innovation by conducting impact assessments and participating in international negotiations to help align tax policies with economic advancements.

The OECD's digital tax framework can develop into a strong and flexible system that supports global economic justice, improves revenue generation, and encourages sustainable growth in a world that is becoming more and more digitalised by putting these suggestions into practice.

VI. Judicial contributions to OECD's global digital tax standards

In order to ensure the equitable and efficient application of the OECD's digital tax standards, the judiciary is essential in formulating and interpreting tax legislation. In settling tax disputes, interpreting international tax treaties, and offering legal clarification on matters pertaining to digital taxes, courts all over the globe have played a crucial role. The establishment of precedents by the judiciary aids governments, multinational firms, and tax agencies in negotiating the intricacies of international digital taxes.

(A) Key Judicial Contributions to Digital Taxation

1. Interpretation of OECD's Digital Tax Framework in National Courts

Judicial bodies play a crucial role in interpreting and applying OECD tax principles within domestic legal systems. They analyse the alignment of digital taxation rules with existing corporate tax laws and ensure their fair and consistent implementation. Many tax-related cases involve disputes between governments and multinational corporations, requiring courts to assess whether new digital tax regulations comply with national constitutions and international agreements. In some jurisdictions, courts have also ruled on whether OECD tax guidelines should be considered binding obligations or merely recommendations, thereby influencing how countries incorporate these principles into their legal frameworks.

2. Landmark Judicial Decisions on Digital Taxation

The development of digital tax laws has been influenced by a number of significant court decisions and cases:

a) Google Ireland Ltd. v. Commissioner of Taxes (France, 2019)

In this instance, the French Administrative Court decided that Google Ireland Ltd., an Irish-based company of Google, was exempt from French back taxes. The issue arose from claims made by the French tax authorities that, although making large profits from French consumers, Google had been evading taxes by passing its European activities through its Irish subsidiary, lowering its tax obligation in France. Because Google Ireland Ltd. lacked a "permanent establishment" in France, the court said, France was unable to levy corporation taxes on the subsidiary's profits under the current international tax system. The decision emphasised how challenging it is for national tax authorities to tax online companies that operate in several jurisdictions without having a significant physical presence in any one of those countries. The wider difficulties of taxing global digital corporations especially those that depend more on digital services and intangible assets than on conventional brick-and-mortar businesses were brought to light by this case. It also reaffirmed how urgent it is to put global tax changes, like the OECD's Pillar One plan, into effect. In order to ensure that market jurisdictions receive an equitable share of tax revenues, the idea seeks to reallocate a part of the earnings from massive multinational corporations (MNEs) to the nations where their customers reside. Thus, the Google Ireland case sparked debates on the need for coordinated worldwide tax policies by providing a crucial illustration of why international tax laws need to be revised to match the reality of the digital economy.

b) **Amazon.com Inc. v. Commissioner (U.S. Tax Court, 2017)**

The U.S. Tax Court decided in favour of Amazon.com Inc. in this historic case, enabling the business to transfer a sizeable amount of its earnings to its Luxembourg subsidiary through cost-sharing agreements. The conflict started when Amazon's transfer pricing practices were contested by the IRS[10], which claimed that the corporation had undervalued its intangible assets, including technology and intellectual property, when dividing its revenue between its international and domestic businesses. Amazon argued that the IRS's reallocation of money was unreasonable and that its cost-sharing plan was in line with arm's-length standards. After deciding that the IRS had inflated the value of the transferred intangibles and had used the wrong approach to determine taxable income adjustments, the Tax Court finally ruled with Amazon. The ruling highlighted gaps in international tax regulations that enabled computer firms to transfer revenues to low-tax jurisdictions in order to reduce their tax obligations, which had wide-ranging effects on multinational corporations. The decision also had a significant impact on international tax policy debates, supporting the OECD's initiatives to strengthen transfer pricing laws and stop MNC's from engaging in BEPS.

c) **Apple Inc. v. European Commission (General Court of the European Union, 2020)**

The GCEU[11] reversed the European Commission's ruling in this well-known case, which had mandated that Apple Inc. reimburse the Irish government €13 billion in unpaid taxes. Prior to this, in 2016, the European Commission declared that Apple had received unlawful state assistance from Ireland in the form of preferential tax treatment, which in certain years had allowed the corporation to pay an effective corporate tax rate as low as 0.005%. Through two

[10] Internal Revenue Service.
[11] General Court of the European Union.

advance tax judgements, the Commission said that Ireland had given Apple selective tax benefits, allowing the corporation to transfer a sizeable amount of its European revenues to a "head office" that didn't actually exist—it had no workers or physical location. The Commission claims that because this agreement gave Apple an unfair advantage over rivals and distorted the internal market, it breached EU competition law. Apple and the Irish government contested the decision, claiming that Apple had not been given preferential treatment and that the tax arrangements were in accordance with Irish law. The European Commission was unable to demonstrate that Ireland had provided illegal state aid, according to the General Court's decision in favour of Apple. According to the court, the Commission had not shown a selective benefit or shown enough proof that the tax decisions differed from standard Irish tax laws. The case highlighted the continuous conflict between EU competition laws, national tax sovereignty, and international initiatives to stop tax evasion. It also emphasised how difficult it is to deal with multinational firms' profit shifting under the current regulatory frameworks. The decision was a blow to the European Commission's larger effort to stop corporate tax evasion and make multinational corporations pay more taxes. Even though Apple won the lawsuit, it sparked more conversations about international tax changes, especially in relation to the OECD's BEPS programs.

d) **Vodafone International Holdings v. Union of India (Supreme Court of India, 2012)**

The Supreme Court of India decided in favour of Vodafone International Holdings B.V. in this historic case, concluding that the business was exempt from paying capital gains tax on its overseas purchase of an Indian telecom business. The case concerned Vodafone's 2007 purchase of shares of CGP Investments Ltd., a Cayman Islands-based business, from Hong Kong-based Hutchison Telecommunications International Ltd., which resulted in Vodafone acquiring a 67% holding in Hutchison Essar Limited, an Indian telecom firm. The estimated value of the deal was $11 billion. Given that the underlying assets were situated in India, the Indian tax authorities contended that Vodafone had to withhold tax on the capital gains resulting from the deal. By claiming that the transfer of shares in the offshore company essentially led to the indirect sale of an Indian asset, the tax department attempted to impose capital gains tax on the transaction. Conversely, Vodafone argued that the transaction was between two foreign corporations and thus not subject to Indian tax rules. In its 2012 ruling, the Supreme Court sided with Vodafone, holding that the Indian tax authorities lacked the authority to apply capital gains tax on an offshore transaction. The Court underlined that unless specifically permitted by Indian tax legislation, indirect transactions of shares in foreign corporations that own Indian assets are exempt from taxation. The decision strengthened the idea that tax obligation must be established by precise legislative requirements rather than sweeping interpretations by tax officials, and it brought much-needed clarity to the extent of India's taxation of cross-border mergers and acquisitions. Foreign investors viewed the ruling as a significant victory as it established legal clarity on cross-border taxation. However, the Indian government responded to the ruling by amending the Income Tax Act, 1961 retroactively in the Union Budget of 2012, which permits tax officials to tax such offshore transactions for capital gains. Long-running legal disputes and worries about India's tax laws among foreign investors resulted from this retroactive revision. Outside of India, the Vodafone case had an impact on international debates on source-based taxation principles and digital tax changes in accordance with OECD standards. It emphasised how difficult it is for governments to impose taxes on multinational firms that use intricate offshore arrangements. Additionally, the case helped advance continuing global initiatives to combat tax evasion tactics, especially in light of the OECD's BEPS program.

e) **Facebook Ireland Ltd. v. Italian Revenue Agency (Italy, 2022)**

The Italian Revenue Agency (Agenzia delle Entrate) accused Facebook Ireland Ltd. of tax evasion in this high-profile tax case, claiming that the firm had been transferring its profits through its Irish subsidiary in order to reduce its tax liabilities in Italy. The main issue in the case was whether Facebook's activities in Italy qualified as a permanent establishment (PE) under Italian tax law, which would have required the corporation to pay corporate income tax in Italy instead of transferring revenues to a country with lower taxes, such as Ireland. Like many other global digital corporations, Facebook had been operating under a "double Irish" tax structure, which reduced its taxable presence in Italy by contractually attributing income from advertising and other services in Italy to Facebook Ireland Ltd. However, the Italian tax authorities said that Facebook had a substantial economic presence in the nation, with offices, staff, and commercial operations that directly generated income. Whether these operations satisfied the requirements for a permanent establishment under Italian and international tax law was the main legal concern. Despite its contractual arrangement that sent money to Ireland, the Italian court decided in favour of the tax authorities in 2022, finding that Facebook did, in fact, have a permanent operation in Italy. The court's decision was predicated on the notion that Facebook's operations in Italy were crucial to securing and promoting business in the nation, which in turn helped to generate money. This ruling was in line with the global trend towards market jurisdiction taxation, which taxes digital businesses according to their economic value creation rather than their official profit registration location. The decision established a significant precedent in Italy and the EU, backing initiatives to stop profit shifting and enforcing tougher tax laws on global IT companies. It also aligned with the OECD's digital tax ideas,

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namely the Two-Pillar Solution to overhaul global taxes and the BEPS project. Based on the idea that earnings ought to be taxed where economic activity and value creation take place, the ruling represented the larger trend of nations claiming taxation powers over digital businesses. Other European tax authorities have stepped up their examination of multinational digital firms in the wake of this case, indicating a shift towards stricter enforcement of tax rules against internet giants who operate in many jurisdictions.

3. Resolution of Tax Treaty Disputes and Double Taxation Issues

When multinational firms argue that new digital tax regulations violate pre-existing bilateral tax treaties, numerous legal conflicts result. Courts mediate disputes between countries and firms in these situations, deciding whether OECD tax standards supersede previous tax accords. Furthermore, international tax arbitration tribunals support Mutual Agreement Procedures (MAPs), which offer a way to settle disputes about double taxation, especially when several nations contend they have the right to tax the same digital revenue.

4. Upholding Fair Taxation and Preventing Tax Avoidance

In order to prevent businesses from taking advantage of legal loopholes to transfer earnings to low-tax jurisdictions, courts have played a crucial role in detecting and punishing aggressive tax avoidance strategies. Anti-tax evasion laws have been maintained by landmark decisions, highlighting the necessity of more financial openness in digital business operations.

5. Enforcing Compliance with OECD's Pillar Two Global Minimum Tax

In order to stop businesses from using intricate tax planning techniques to get around the 15% global minimum tax, judicial bodies are essential in ensuring that governments correctly implement and execute the law. Courts also hear appeals from businesses contesting tax assessments, guaranteeing that Pillar Two rules are administered equitably and uniformly across all sectors.

(B) Challenges in Judicial Enforcement of Digital Taxation

Courts play a crucial role in resolving jurisdictional conflicts by determining whether national tax laws take precedence over international frameworks, particularly when OECD standards contradict existing regulations. As digital tax laws continue to evolve, judicial bodies often face legal uncertainties, requiring extensive interpretation to address ambiguities in tax legislation. Additionally, resistance from corporations, particularly tech giants, frequently leads to challenges against digital tax rulings, resulting in prolonged litigation that can delay tax collection efforts. In the rapidly changing world of digital taxes, judicial institutions act as protectors of justice and legal certainty. Courts contribute to the successful implementation and enforcement of the OECD's global tax policies through historic decisions, treaty interpretations, and tax dispute settlements. They continue to play a crucial role in striking a balance between national tax laws and business interests, which eventually helps create a more open and just international tax system.

VII. Conclusion

In order to solve the intricate issues that emerge in the quickly changing digital economy, the OECD is a key player in establishing international digital tax rules. Traditional taxation regimes find it difficult to guarantee equitable tax allocation across countries when digital enterprises expand outside national borders. The OECD has responded by spearheading initiatives to develop a more equitable, inclusive, and sustainable international tax system that takes into account the special characteristics of digital transactions. The OECD aims to reduce tax base erosion and profit shifting by promoting a more equitable and transparent tax system. This will guarantee that multinational firms pay their fair share of taxes in the countries where they create economic value. The launch of international programs like the Two-Pillar Solution shows the OECD's dedication to promoting tax justice and minimising differences between developed and poor nations.

Notwithstanding notable advancements, obstacles still exist, including as disparities in national tax laws, worries about adherence and implementation, and the requirement for more political agreement among participating countries. Governments, tax authorities, and multinational firms must work together continuously to establish a fair and successful digital taxation system. The OECD has to concentrate on improving its regulations, responding to stakeholder concerns, and making sure that they are implemented consistently across states. For the global tax system to remain credible and successful, transparency, flexibility, and inclusion in tax governance will be essential. The OECD's impact on digital taxation will continue to be crucial in determining how the world economy adjusts to digitalisation in the future. The OECD can make a substantial contribution to creating a tax system where digital businesses contribute proportionately to national revenues by enhancing international cooperation and encouraging a shared commitment to fair taxation. This will ultimately support global economic stability and development.

(A) Recommendations

To further strengthen global digital tax standards and ensure that taxation policies remain fair, effective, and adaptable to the evolving digital economy, the OECD should consider the

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following strategic recommendations:

1. Strengthening Global Consensus and Cooperation

To solve issues with tax sovereignty and guarantee a just distribution of income, rich and developing countries must increase their diplomatic ties. The danger of tax policy fragmentation can be decreased by fostering the widespread adoption of international digital tax standards through more communication with non-OECD nations. Additionally, unilateral digital tax policies that might spark international trade conflicts should be avoided by promoting multilateral collaboration through regional tax agreements.

2. Ensuring Efficient and Uniform Implementation

Creating thorough rules and standards is essential to helping states execute the OECD's digital tax policy. Developing countries can integrate digital tax measures into their local tax systems with the support of technical assistance and capacity-building initiatives. Furthermore, the implementation of worldwide compliance monitoring systems guarantees the efficacy of digital tax laws while averting vulnerabilities that international firms can take advantage of.

3. Promoting Transparency, Compliance, and Fair Taxation

Ensuring that global digital firms declare their sales, earnings, and tax payments in each country where they operate requires advocating for stricter corporate tax transparency standards. Stricter implementation of BEPS laws and improved monitoring will assist strengthen international anti-tax evasion measures and stop digital companies from moving their revenues to low-tax jurisdictions. Furthermore, encouraging nations to harmonise their national digital tax systems with OECD guidelines fosters uniformity and lowers the possibility of tax evasion or double taxation.

4. Adapting to Rapid Technological Advancements

In order to accommodate new digital business models such as blockchain-based platforms, cryptocurrencies, artificial intelligence-driven firms, and decentralised finance (DeFi), tax regulations need be updated on a regular basis. Creating dynamic and adaptable tax laws that can keep up with the quickly changing digital sectors without impeding technological advancement and innovation is crucial. To guarantee that digital tax policies remain relevant in the face of technical advancements and changing digital marketplaces, frequent impact analyses should also be carried out.

5. Enhancing Dispute Resolution Mechanisms

Frameworks for international tax dispute settlement should be reinforced in order to avoid protracted court cases between businesses and tax authorities, which might jeopardise the stability of the world economy. In order to resolve tax-related disputes and stop individual countries from enacting retaliatory tax policies, it is imperative to support multilateral tax accords. In order to improve efficiency in handling cross-border tax disputes and expedite dispute resolution procedures, tax administration should also promote the use of digital tools and automation.

6. Encouraging Sustainable and Balanced Taxation Practices

It is important to make sure that digital tax laws don't hinder innovation or deter foreign direct investment, particularly in developing nations. Finding a balance between promoting a competitive business climate and equitable taxes is essential for the expansion of digital businesses. Tax income from digital enterprises should also be used to assist public welfare programs, improve digital infrastructure, and finance economic growth projects.

By putting these strategic proposals into practice, the OECD can further solidify its position as a leader in global digital tax governance and guarantee that taxation regimes continue to be strong, inclusive, and flexible enough to keep up with the rapidly evolving digital economy. In addition to fostering equity in international taxation, a well-designed and widely recognised digital tax system can boost economic expansion, improve fiscal stability, and lessen trade conflicts involving taxes. In the end, the success of these measures will rely on ongoing international collaboration, implementation transparency, and the OECD's capacity to quickly and strategically handle new issues in digital taxes.

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VIII. References

1. Organisation for Economic Co-operation and Development (OECD). *Addressing the Tax Challenges of the Digital Economy.* OECD Publishing, 2021.
2. Zucman, G. *The Hidden Wealth of Nations: The Scourge of Tax Havens.* University of Chicago Press, 2015.
3. Avi-Yonah, R. *International Taxation in an Era of Digitalization.* Cambridge University Press, 2022.
4. Organisation for Economic Co-operation and Development (OECD). *Tax Challenges Arising from Digitalisation – Economic Impact Assessment.* OECD/G20 Base Erosion and Profit Shifting Project, 2020.
5. International Monetary Fund (IMF). *Corporate Taxation in the Global Economy.* IMF Policy Paper, 2019.
6. Becker, J., & Englisch, J. "International Digital Taxation in the Post-BEPS Era: Challenges and Proposals." *World Tax Journal,* vol. 12, no. 3, 2020, pp. 145–171.
7. Devereux, M. P., Vella, J., & Wardell-Burrus, M. *Can Pillar 1 of the OECD's Proposals be Simplified?* Oxford University Centre for Business Taxation, 2021.
8. Organisation for Economic Co-operation and Development (OECD). *Two-Pillar Solution to Address the Tax Challenges Arising from the Digitalisation of the Economy.* OECD Publishing, 2021.
9. Dharmapala, D. "The Economics of Corporate and Business Tax Reform." *National Tax Journal,* vol. 72, no. 4, 2019, pp. 761–784.
10. Fuest, C., & Riedel, N. "Taxing Multinational Enterprises in the Digital Age: The OECD's Pillar One Proposal." *Journal of International Taxation,* vol. 32, no. 2, 2021, pp. 87–110.
11. Owens, J. "The Role of the OECD in Global Tax Governance." *Intertax,* vol. 47, no. 5, 2019, pp. 463–476.
12. Cockfield, A. "Protecting Tax Bases in the Digital Economy." *Canadian Tax Journal,* vol. 67, no. 1, 2019, pp. 29–54.
13. Picciotto, S. *International Business Taxation: A Study in the Internationalization of Business Regulation.* Cambridge University Press, 2018.
14. Graetz, M. J. *Follow the Money: Essays on International Taxation.* Yale University

Press, 2020.

15. Organisation for Economic Co-operation and Development (OECD). *BEPS Action 1: Addressing the Tax Challenges of the Digital Economy.* OECD Publishing, 2015.
16. Vella, J. "Digital Services Taxes and the Future of International Taxation." *British Tax Review,* no. 3, 2020, pp. 321–345.
17. Baez, A., & Brauner, Y. *Taxing the Digital Economy: The EU Proposals and OECD Initiatives.* IBFD, 2020.
18. Lamensch, M. "The Future of Digital Taxation in a Global Economy." *World Tax Review,* vol. 15, no. 2, 2021, pp. 178–204.
19. United Nations (UN). *Taxation of the Digital Economy: A UN Perspective.* UN Committee of Experts on International Cooperation in Tax Matters, 2022.
20. European Commission. *Proposal for a Council Directive on the Common System of a Digital Services Tax on Revenues Resulting from the Provision of Certain Digital Services.* Brussels, 2018.

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