



# Permanent Establishments: Domestic Taxation, Bilateral Tax Treaty and OECD Perspective

*Ekkehart Reimer, Stefan Schmid, Marianne Orell*

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Permanent Establishments (PEs) are a key facet of international taxation. They constitute the crucial threshold for the assignment of taxing rights to a jurisdiction in all cases of enterprises operating in more than one country. The issue of whether there is a PE, and how much profit should be allocated to it, is an increasingly important factor in tax planning, tax accounting, tax compliance, and related tax risk management.

This academically rigorous yet thoroughly practical work provides comprehensive guidance on a variety of complex PE issues. Its initial chapters analyse the latest OECD developments in the context of Articles 5 and 7 of the OECD Model Tax Convention (2014 update) while 20 country chapters cover domestic PE issues as well as country-specific treaty developments from a practical perspective.

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