



華東政法大學

East China University of Political Science and Law



Peculiarities of the International Tax Treaty Policy of China

Dr. Na Li

East China University of Political Science and Law

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Shifting from Source State to Residence State

- tax treaties signed with 104 jurisdictions
- focused on source state taxation: a capital importer
- shifting to residence state taxation: a capital exporter
- challenges under the “One Belt One Road” initiative
- balance between source state and residence state



Enforcing Anti-Avoidance Measures

- **targeting on indirect shares transfer: “reasonable business purpose” test**
- **reflecting location saving and market premium factors in transfer pricing: formula apportionment methods**
- **enlarging the network for exchange of information**



Prospects for Harmonization

- harmonization through setting up a network structure:
 - a multilateral tax treaty among the BRICS countries?
 - a tax policy sector in the BRICS bank?
 - coordinated actions on the BEPS project?
- role of the BRICS in global tax policy: from norm taker to norm maker



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Thank you!

Email: na.li@wu.ac.at