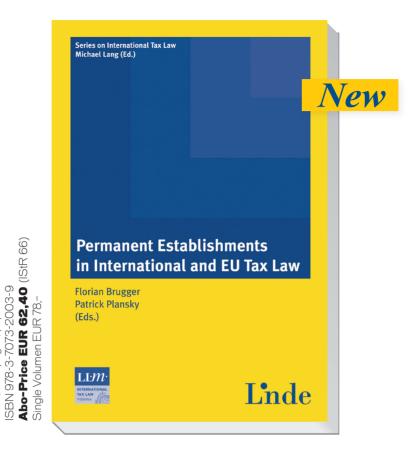
Permanent Establishments in International and EU Tax Law



The concept of permanent establishment is a corner stone of international taxlaw. The authors, all graduates of the post graduate program in International Tax Law at the Vienna University of Economics and Business (WUWien), analyze this concept in detail. The contributions focus on the permanent establishment definition under **Article 5 OECD Model Convention**, the attribution of profits to permanent establishments under **Article 7 OECD Model Convention**, and permanent establishment issues arising under EU tax law.

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