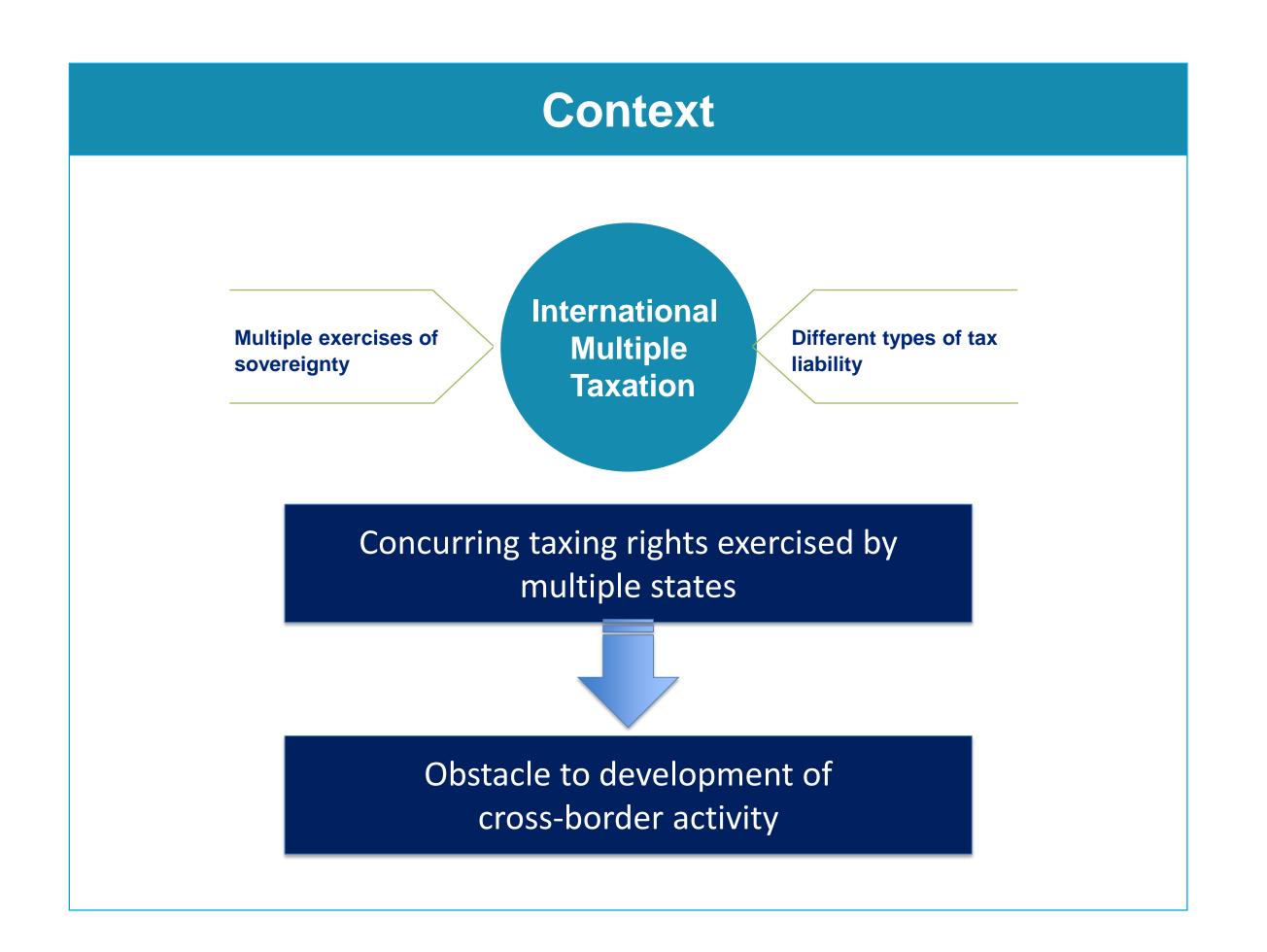
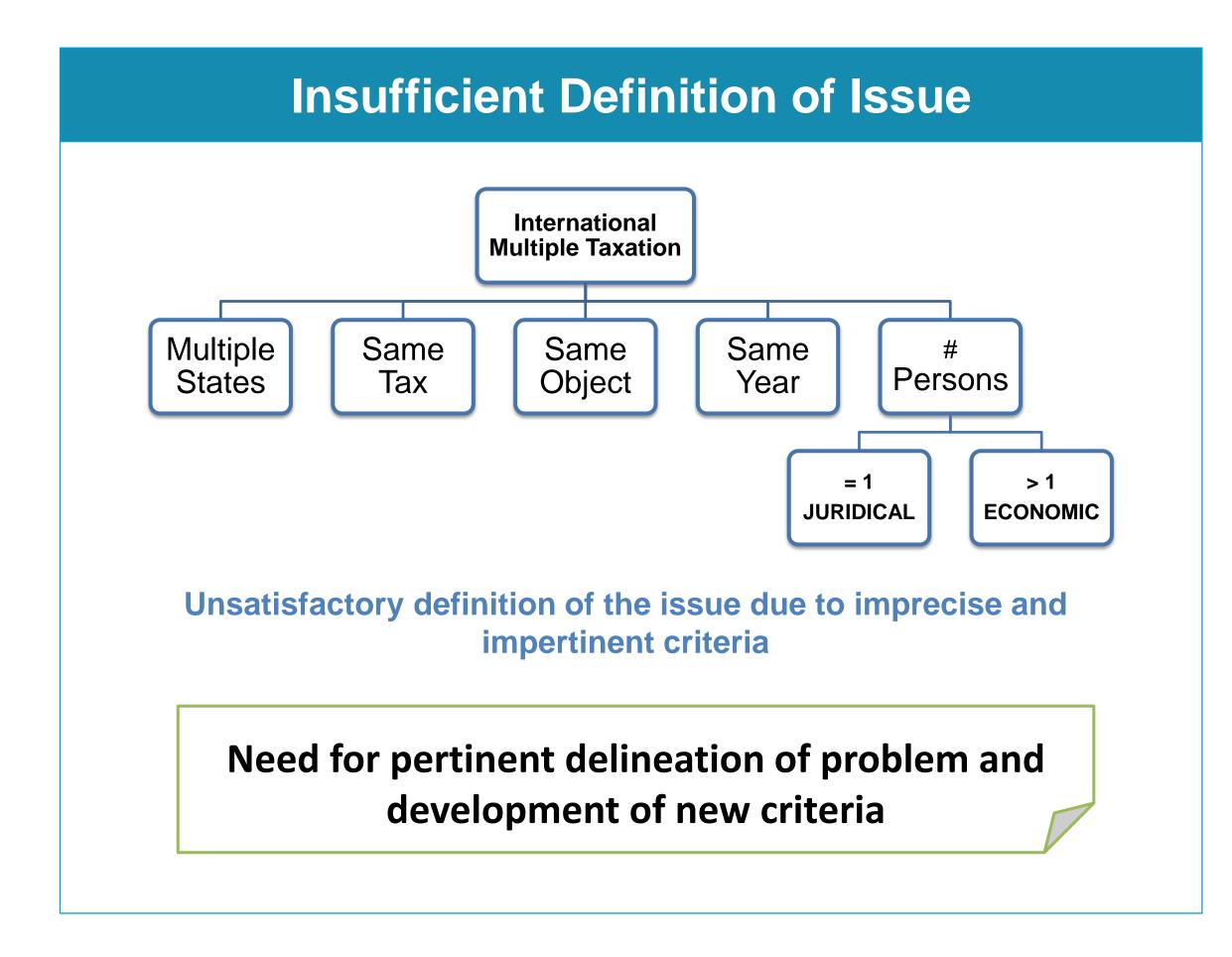


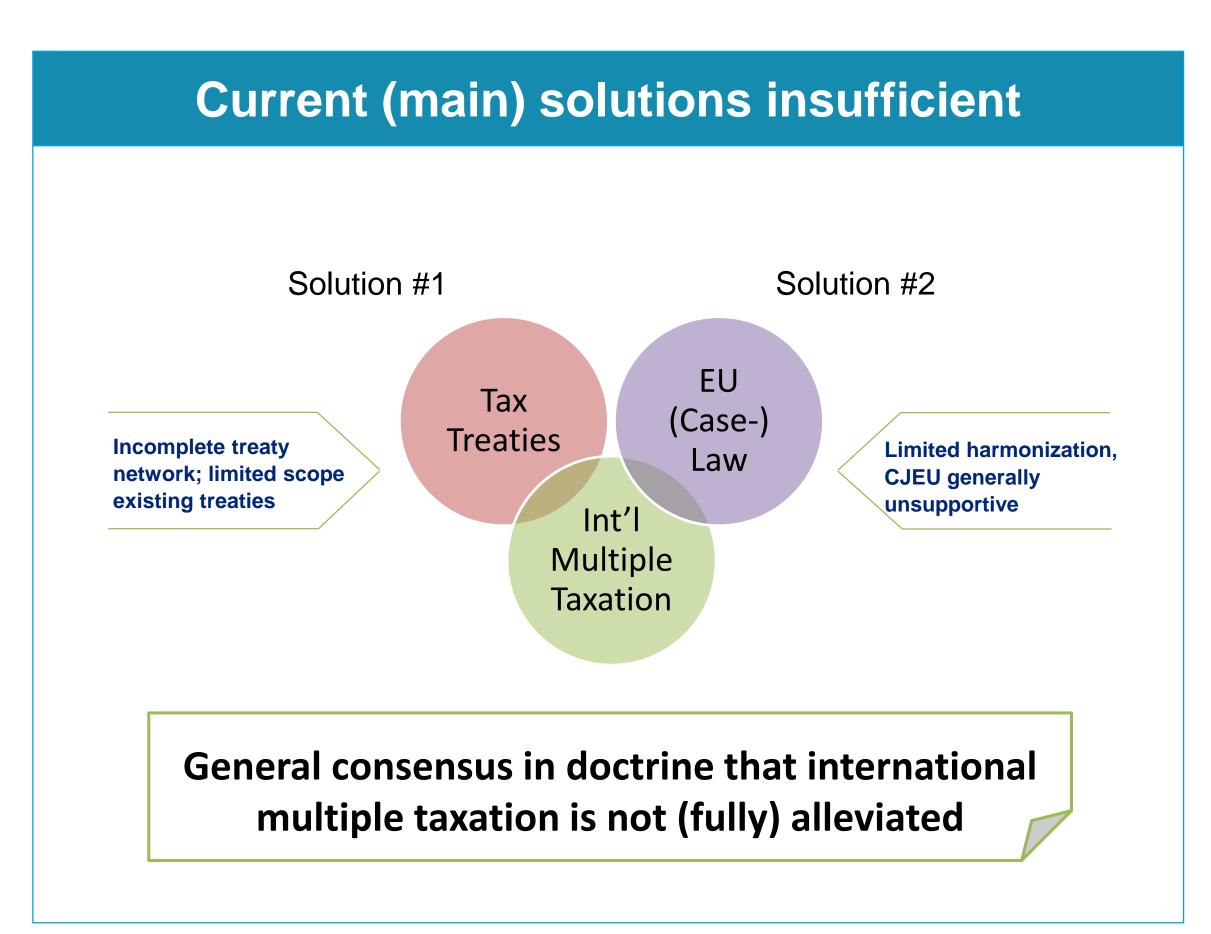
Excessive International Taxation

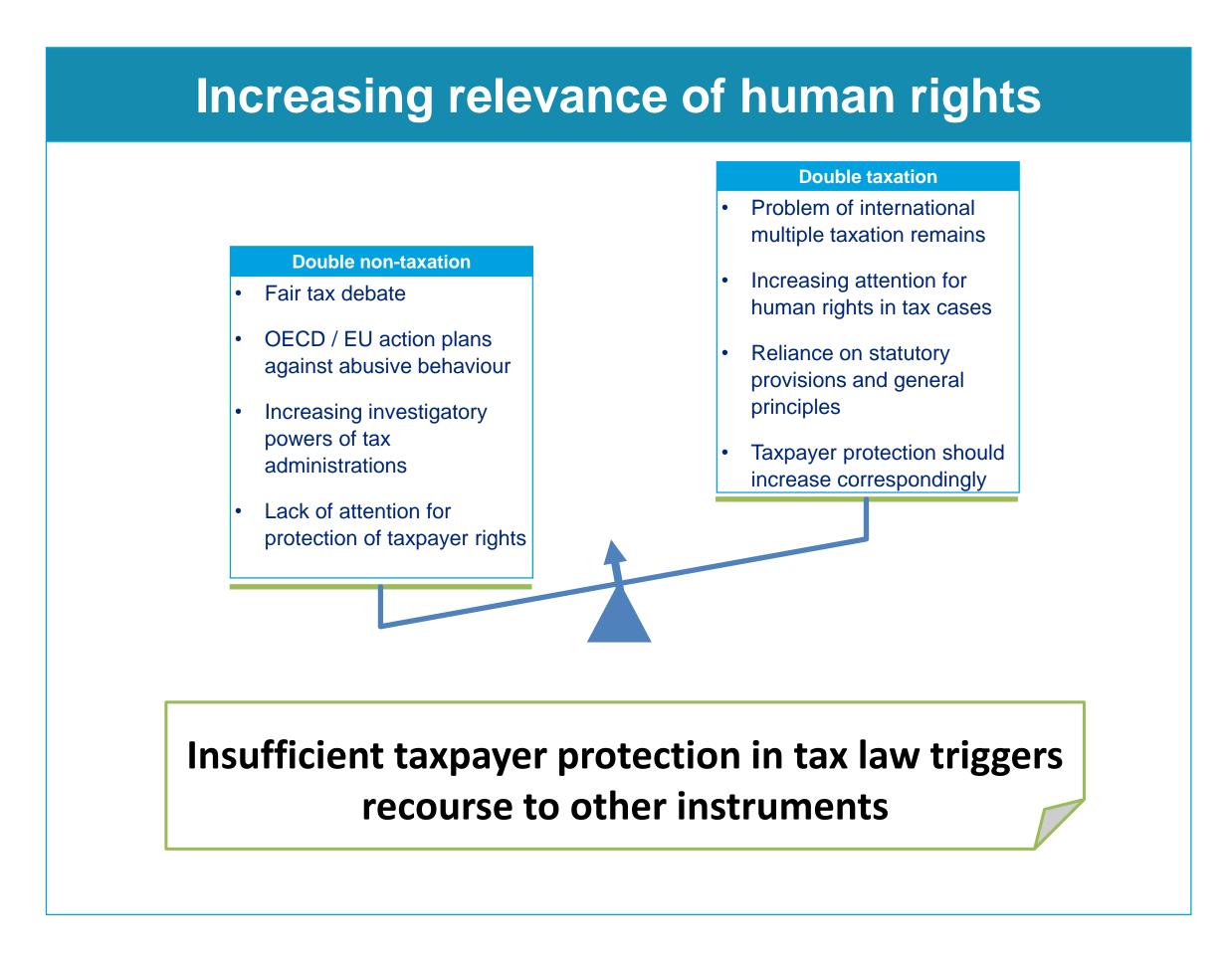
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What are the relevant external limitations to the exercise of fiscal sovereignty with a view to limiting international multiple taxation? On the basis of the limitations under (1), which are the relevant criteria when dealing with cases of international multiple taxation (i.e. when is international taxation excessive)?

