



# Income Tax Ordinance 2001

How It Affects You?

# Tax Guide Sept 2001

**Ernst & Young LLP, Margaret Milner  
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represents a viable alternative to the arm's length standard currently applied in international tax law. The study comprises four parts. First, a theoretical concept of formulary apportionment is presented, followed by an evaluation of the practical experiences of four jurisdictions: United States, Canada, Switzerland, and Germany with formulary apportionment at the subnational level. Next, a proposal for harmonization on the basis of consolidation and apportionment is developed, and the book concludes with an overall analysis of the merits and drawbacks of the proposed model for harmonization.

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