

Content

Series Editor's Preface	V
Editors' Preface	VII
List of Authors	IX
List of Abbreviations	XV
<i>Kasper Dziurdź/Christoph Marchgraber</i>	
Non-Discrimination in European and Tax Treaty Law: An Overview	1
<i>Barbara Hagen</i>	
Schumacker Comparability – the Conditions of the Schumacker Doctrine	19
<i>Andressa Pegoraro</i>	
Non-Discrimination under EU Law: Comparability of Corporations and Permanent Establishments	41
<i>Jessica Di Maria</i>	
Comparability in the case of Hybrid Mismatch: In Search of an Approach Suitable for the Current European Landscape	63
<i>Lenka Horváthová</i>	
Symmetry between Profits and Losses as a Justification under EU Law (or the Two Sides of the Same Coin)	87
<i>Lidija Živković</i>	
Finality of Losses and their Different or Preferential Treatment	105
<i>Steve Froese</i>	
The Relevance of Low Taxation as a Justification for Discriminatory Measures	129
<i>Ramon Tomazela Santos</i>	
Prevention of Hybrid Mismatches as a Justification?	163
<i>Giulia Gallo</i>	
Equivalence of a Dividend Exemption and an Underlying Tax Credit	195
<i>Lucas Ebram Vilhena de Moraes</i>	
Underlying Tax Credit in the Case of a Deduction and Non-Inclusion Scheme?	217
<i>Jean Glodas</i>	
Difference Between Individuals and Corporations in Exit Tax Cases	243

Content

<i>Carla Elizabeth Tovar Palomo</i>	
Optional Regimes as a Remedy to Discriminatory Treatment	267
<i>Joseph Michael Kennedy</i>	
Influence of the Fundamental Freedoms on the VAT Directive	285
<i>Michalis Kalogirou</i>	
Selectivity of State Aid: a Rule/Exception Test or a Comparability Analysis?	309
<i>Fernando Munhoz Ribeiro</i>	
Comparability Assessment under the Non-Discrimination Clause of Article 24 of the OECD Model	335
<i>Yves Van Brussel</i>	
The Relevance of Residence as a Safeguard in Article 24(1) of the OECD Model	353
<i>Harshal Bhuta</i>	
Progressive Tax Rates in a Profit or Loss Situation under Article 24(3) of the OECD Model	377
<i>Stefano Balestieri</i>	
Juridical Double Taxation Relief under Article 24(3) of the OECD Model: The PE Country's Obligations	403
<i>Klemens S. Wandl</i>	
Prevention of Economic Double Taxation under Article 24(3) of the OECD Model	427
<i>Sami Pitkänen</i>	
Consolidating Group Members with a PE of a Foreign Enterprise under Article 24(3) of the OECD Model	461
<i>Rodolfo Zanutto Velasques</i>	
Creditor Non-Discrimination under Article 24(4) of the OECD Model in the case of Deduction and Non-Inclusion Schemes	487
<i>Irina Viktorovna Isakova</i>	
Thin Capitalization Rules under Article 24(4) and 24(5) of the OECD Model	511
<i>Jiří Kostohryz</i>	
Ownership Non-Discrimination under Article 24(5) of the OECD Model in the Case of Low-Taxed Payments	533
<i>Murillo Estevam Allevato Neto</i>	
Cross-Border Tax Consolidation under Article 24(5) of the OECD Model ..	553
<i>Fabiola Angélica Díaz Prado</i>	
Influence of Article 24 on Taxes Not Covered by Article 2 of the OECD Model	575