JEOPARDY 5-topic Template

John Kelleher, Crowe LLP Artemis Koch, UPenn

Jodi Kessler, MIT Bob Lammey, EY



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JEOPARDY BOARD			FINAL JEOPARDY		
PE	Workers Abroad	OECD CbC	Indirect Taxes	Potpourri	
\$100	\$100	\$100	\$100	\$100	
\$200	\$200	\$200	\$200	\$200	
\$300	\$300	\$300	\$300	\$300	
\$400	\$400	\$400	\$400	\$400	
\$500	\$500	\$500	\$500	\$500	

1

Topic 1 - \$100 Question

A dependent agent (employee) conducts activities on behalf of an organization in another country

Click to see answer (S)

Topic 1 - \$100 Answer

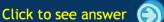
What is an Agency Permanent Establishment?

Generally an agent must be a dependent agent, and the agent has or continues to habitually exercise, an authority to conclude contracts. Article 7 of the BEPS Project broadened the definition of agency PE to include the activities of any agent which regularly result in the creation of new contracts for their employer, even if they do not conclude those contracts themselves (as was the former definition).

3



Having a physical business presence in a foreign country such as an office or branch



Topic 1 - \$200 Answer

What is a Fixed Place of **Business Permanent Establishment?**

Types include: offices, branches, workshops, factories, mines, or oil wells

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