



It is with great pleasure that we present the 2nd Edition of Vol. III of the Chamber's International Tax Journal which represents the continuation of the 3rd year of path-breaking effort in bringing our esteemed readers the very latest developments in international taxation. It is a matter of great honor to us that, within a relatively short time of two years, this Journal has been well accepted by the professional fraternity and industry. In the 1st Edition of Volume III, we have covered challenges and issues of OECD commentary on interpretation, issues facing taxation of digital economy and measures suggested by BEPS Action Plan 1, impact of multiple data leaks on regulatory action & tax assessment, law of precedence & judicial hierarchy, practical impact of TIEA on exchange of information, BEPS Action Plan 6 & LOB, etc. Chapter 1 of this Edition gives an overview on the emergence of international holding structu.....