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Explanation of What Creates
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(PE) Any activity carried
out by a business in a

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Country that results in
revenue being generated or
value created is likely to
be deemed by local tax
authorities as a permanent
establishment, or “PE.”.
Local tax authorities will
in turn assess corporate tax

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on deemed revenue arising in-
country. In most countries,
in order to recognize a PE –
or a taxable presence – the
revenue-generating entity
needs to be formally
registered ...

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the description of the domestic and treaty definitions of permanent establishment, the rules for the attribution of profits to permanent establishments, reporting obligations and administrative requirements,

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and general and targeted
anti-avoidance measures.

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