European Research Studies Journal
Volume XXVIII, Issue 2, 2025

pp. 295-306

Tax Optimization Schemes for Income Tax in Europe and Relevance for Businesses and Society

Submitted 06/03/25, 1st revision 23/03/25, 2nd revision 18/04/25, accepted 30/05/25

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Abstract:

Purpose: *The objective of this article is to analyse how tax optimization schemes for Corporate Income Tax (CIT) in the European Union may impact the societies. Emphasis is placed on how these phenomena were incorporated into the business activities of modern corporations, and how increasing its application and adoption. In addition, will be identified challenges that may be posed before tax authorities of EU Countries, as a consequences of increasing popularity of tax optimization schemes.*
Design/Methodology/Approach: *This article formulates the following research problems: What are the tax optimization schemes for Income Tax in the European Union? What are the potential deficiencies and obstacles in EU CIT legislation of different policy approaches for addressing these schemes as challenges? Corresponding to this research problem the research hypothesis was formulated: The increasing popularity of tax optimization schemes in the field of CIT among international corporations has a negative impact on the state of public finances of European Union countries. Moreover these phenomena/trends are difficult to be controlled under the current legal regulations. The study employs a detailed analysis of existing scientific literature, standards and regulations related to taxes field. The analysed sources include books, financial statements and scientific articles aimed at understanding the theoretical foundations of tax regulations and tax schemes, as well as identifying challenges in this field.*
Findings: *To avoid reducing public revenues, the European Union should strengthen and harmonise its actions in the field of tax avoidance, especially by large international corporations. In order to achieve this goal should be created an efficient European Union tax policy system.*
Practical Implications: *The results of the study indicate negative, social and economic consequences for European countries of using tax optimization in the area of Corporate Income Tax, especially by large international corporations. The article describes only those optimization strategies, which construction have been recognized and examined, and which have been regulated to some extent. The author pointed out that it is not easy to regulate and solve problems of income tax optimizations, especially in the area of new technologies. In such cases it is difficult to clearly link income with the place of its generation, as in online services or Internet advertising. This area is extremely dynamic and law-making bodies and tax authorities still face many challenges to regulate these issues and persuade large corporations to participate in social costs of individual countries.*

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Originality/Value: *The article presents a comprehensive approach to the increasing phenomenon of tax optimizations with particular emphasis on its impact on contemporary business organizations and societies. It discusses key problems, methods and potential recommendations in order to reduce the problem*

Keywords: *Tax optimization, tax avoidance, tax systems, tax regulations, CIT.*

JEL codes: *H26, H30, H87.*

Paper type: *Research article.*

1. Introduction

In this research paper are discussed tax optimization schemes for Corporate Income Tax (CIT) in the European countries, using case studies of international corporations. The main goal of this paper is to analysis of the significance of tax optimizations from social and economic perspective.

Tax avoidance by business entities continues to be a significant concern for governments of many countries. Tax revenues can be used to steer the economy towards specific economic or social goals. Without an appropriate level of tax revenues, it is impossible for social security systems to function effectively, as well as maintain the stability of the public finance system in economically developed countries.

However, the problem turns out to be the low willingness, especially of large corporations, to participate fair in these systems. In the same time these entities generate enormous revenues in European countries. Unfortunately, the use of loopholes in the law, as well as the lack of effective legal regulations for some areas of activity, allow such activities to be considered legal, although they remain socially harmful.

This poses many challenges for governments and tax authorities of European countries, and for EU authorities in the area of regulating these issues. It must be admitted that some actions in this area have been taken. New regulations have been introduced, e.g. the minimum tax Directive Pillar 2, but still much remains to be done in this area.

On the other hand, large corporations are very dynamic organizations and quickly adapt to new conditions, often evolving to bypass the restrictions imposed by newly introduced legal regulations.

2. Literature Review

To analyse the problem, first must be answered the question: what is tax optimization and what are its objectives? What are the differences between tax optimization, tax avoidance and tax evasion? According to Wyciślok tax optimization means "selecting the structure of a planned activity (e.g., transaction) that allows for minimizing the total tax burden (Wyciślok, 2013)

Tax optimization is the selection of such form and structure of the planned transaction within the framework and limits of applicable tax law in order to reduce the level of tax burden (Jamroży *et al.,* 2007). According to Arnold and Lewis (2019) define tax optimization as steps taken to reduce taxes that are permitted by law (Arnold and Lewis, 2019).

Considering legality of tax optimization, it is worth mentioning the opinion of L. Hand "Anyone may arrange his affairs so that his taxes shall be as low as possible; he is not bound to choose that pattern which best pays the treasury. There is not even a patriotic duty to increase one's taxes. Over and over again the Courts have said that there is nothing sinister in so arranging affairs as to keep taxes as low as possible. Everyone does it, rich and poor alike and all do right, for nobody owes any public duty to pay more than the law demands." (Hand, 1934).

In line with this opinion remains Barbuta-Misu explains that tax optimization involves identifying methods or techniques so that companies as taxpayers can enforce tax regulations in the sense that most benefits their own interests, namely to reduce tax costs related to operations or transactions carried out (Barbuta-Misu, 2016)

The Judge of U.S. Supreme Court O.W. Holmes said that, "Taxes are the price we pay for a civilised society." (Holmes, 1927).

In the same context, it is also worth quoting the words of Z. Radwański, according to his opinion "there is no legal basis to adopt the masochistic principle that the parties should always regulate their civil law relations in a way that is most beneficial to the tax authorities" (Radwański, 2000)

The cited views only confirm the belief that the desire to reduce tax burdens does not constitute a negative action and should not be condemned by society, as long as it is carried out in accordance with the applicable law (Eriotis *et al.,* 2021).

Tax optimization is an extremely complex issue. It should be analyzed from at least several perspectives. Optimization is divided into two processes, i.e. the planning process and the analysis process. According to J. Wyciślok, tax optimization as an economic category is "translated as tax planning aimed at creating optimal tax and tax-related structures and solutions related to taxpayers' undertaking specific investment" economic activities, e.g., operational (Wyciślok, 2013)

Tax optimization constitutes one of those phenomenon difficult to define because it is frequently confused with tax evasion and tax avoidance. In reality, whether it is tax avoidance or tax evasion, the end result is that the tax payer exploits various situations in order to reduce their tax burden.

There is always a debate about the constitutionality of tax optimization, which further complicates these concepts. However, introducing the concept of gravity into the taxpayer's behaviour can help differentiate tax optimization from tax evasion or avoidance. In the case of fraud, the latter intentionally violates the tax rules (Burandt, 2021).

In the literature on the subject, three forms of classification of taxpayer activities in legal tax optimization can be observed, i.e., tax planning, tax saving and tax avoidance.

Tax planning is a well-known tool or set of tools used for business financial optimization. Tax planning refers to the process of organizing one's financial affairs in a way that minimizes tax liabilities while ensuring compliance with tax laws and regulations.

On the other hand, if we are talking about *tax avoidance,* it often means exploiting loopholes in the law to reduce taxes. While there are no doubts about its legality, we can consider the ethical side of this phenomenon. Tax avoidance refers to situations in which taxpayers find ways to reduce taxes (Kovermann *et al.,* 2021, p.20). Avoiding taxation can be creative and remain still within the legal framework.

When considering the issue of the relationship between tax fraud and tax optimization, it is necessary to first explain the essence of the conceptual category of tax evasion, which is precisely what tax fraud is associated with. Tax avoidance situations most often result in the application of sanctions by the tax authorities. There are also some more complex scenarios, such as situations where evidence of fraud is identified, which trigger the launch of criminal investigation mechanisms.

Studies on tax evasion date back to the 1970s. International literature offers a variety of definitions of tax evasion. According to J. Alm, tax evasion is "illegal and deliberate actions undertaken by individuals to reduce their legally due tax liabilities" (Alm, 2012).

Polish literature also contains many definitions that very specifically present the aspect of tax fraud. It is defined as the act of providing false information by a taxpayer regarding a tax liability, through inconsistency with its true tax and legal form (Karwat, 2002).

According to Aivaz Tax fraud is a combination of illegal acts and acts by which taxpayers evade paying taxes. In cases of physical fraud, information supplied to the authorities is intentionally distorted and does not represent a true picture of an entity's financial position. The penalties imposed on the detection of tax fraud have a serious repercussion (Aivaz *et al.,* 2023) and are classified as criminal sanctions.

The Internal Revenue Service (IRS) of the United States in the document created for its employees. The Internal Revenue Manuals defined tax fraud as "a deliberate wrongdoing on the part of a taxpayer with the specific purpose of avoiding payment of tax known or presumed to be due" (IRS, 2014).

To summarize the literature review and the introduction to the conceptual framework: tax planning is a form of compliance with financial regulations, tax avoidance is a form of exploiting loopholes in the of regulations, but usually still remains legal, while financial fraud is subject to strict criminal provisions that sanction the intent to defraud and the liability of the perpetrator.

3. Tax Optimization Schemes

The dynamic development of international corporations, their activity in many areas and countries, as well as the complexity and level of differences in those countries' tax law regulations, has led to the development of many methods of optimizing tax burdens.

According to Saulnier (2021), in the past few decades in Europe, the advancement of globalization and the rapid pace of business collaboration at the global level has instinctively resulted in greater strategic planning and organization by large corporations (MNEs) (Saulnier, 2021).

One of the most important methods may be choice of the right legal form of the company or to creating of complex organizational structures within the group. An important role in using tax optimization in the international dimension is played by the concept of treaty shopping, which is part of the use of double taxation agreements. This procedure is associated with multinational companies.

These companies do not invest in the country where they are hosted, but redirect their investments through another country in order to take advantage of the appropriate treaty agreements of a third country, which cannot be concluded between the country of the company and the country of origin of the investment. The entire operation is carried out by taking advantage of the differences between the tax codes of two different jurisdictions (Lejour *et al.,* 2018)

This type of action is carried out through the creation of a subsidiary in the jurisdiction of that country by the so-called parent entity, which is not entitled to the benefits of the regulations of another country, solely and exclusively for the purpose of using the legal regulations connecting the country of its investment with the country in which the subsidiary was established. Through such actions, the group of companies is not limited only by the regulations covering the agreement between the country of the parent company and the country where the investments are carried out, thus opening the way to using the agreements concluded between the newly established subsidiary and the place of investment. The described solution is a completely legal action (Nawrot, 2014).

To illustrate the use of tax schemes, we can use the example of international corporations Google and Facebook (Meta). Google's business model includes key activities such as research and development in order to create novel innovations and capabilities as well as improve existing ones. Crawling, indexing tasks advertising, ecosystem development, improving search, searching, matchmaking, and displaying are all examples of crawling (Schmidt *et al.,* 2014)

Google's business model is based on concealed business models, in which users are not billed for Google services and the majority of revenue is generated through paid media. Facebook (currently Meta), primarily earns revenues by selling advertising space on its social media platforms, such as Facebook and Instagram.

An interesting example is the implementation of the Double Irish Sandwich mechanism by Facebook and Google. The Double Irish Sandwich was a tax optimization scheme that involved a number of complex processes. First, technology companies move some rights to intellectual property to their Irish subsidiary, where a significant amount of revenue is generated by these intangible property rights.

Because the transaction may be taxable, the U.S. Corporation will ideally perform this transfer prior to the property's value skyrockets. The establishment of a second Irish that decides not to be considered a corporation at all in order to hide its financial standing from the Irish subsidiary is the next phase in the Double Irish Sandwich scheme.

This means that deals between overseas subsidiaries will result in no effect on US taxation, and the subsidiaries' income and activities will be combined. Through the inclusion of a third Dutch subsidiary, the scheme can be further refined into a Dutch Sandwich. The third layer can be thought of as the cheese in the Double Irish. As a result, both Facebook and Google used the Double Irish Sandwich scheme to avoid paying the correct proportion of tax liabilities (Loomies *et al.,* 2011).

Use of complex global corporation and financial architecture helped those corporations to evade paying taxes. Google and Facebook have used complex worldwide business and financial designs. Google continually maintained in a congressional inquiry into transnational corporations' tax avoidance that the value is generated by developing software in California and computations in the placeless

Internet, and that no value - and thus no tax liability - is generated in the individual countries where Google searches are conducted.

Another scheme used in tax optimization is the transfer pricing policy. In the literature, the category of transfer prices functions as prices set by international corporations in intra-company exchange, i.e., in export-import transactions between subsidiaries and their parent company.

The concept of transfer pricing also found its place in the guidelines of the Organization for Economic Cooperation and Development (OECD), where it was defined as "the prices at which an enterprise transfers goods and intangible assets or provides services to associated enterprises" (OECD, 2025)

Google has made headlines for ensuring that its overseas tax burden is severely reduced by limiting cross-border transactions. According to the Internal Revenue Code, U.S. corporations have to pay the mandatory corporate tax rate of 35% on earnings received both abroad and at home.

Nevertheless, Bloomberg.com reported in October 2010 that Google decreased its worldwide tax rate to 2.4%, leading to in a $60 billion loss to the US government. Google achieved this tax optimization scheme by employing income-shifting techniques known to tax lawyers as the "Double Irish" and the "Dutch Sandwich."

Another report concluded that Google relied heavily on transfer pricing as a tax optimization strategy. Google and other multinational corporations use transfer pricing techniques to move their tax liabilities from countries with high taxes to affiliates in low-tax countries, consequently substantially lowering their tax burden (Merle *et al.,* 2019).

Next well known method is making use of loopholes in the tax legislation. Google's Chairman, Eric Schmidt, testified in an interview published in the New York “Independent” that Google took advantage of provisions in tax legislation to significantly reduce its tax burden. According to the report, Google made around £2.5 billion in UK sales in 2011 but only paid £6 million in corporation tax (Kumar and Olivier, 2012).

Another loophole may be exploitation of old tax legislation by Facebook and other large multinational corporations. They have heavily relied on taxation schemes designed around the concept of territorial jurisdiction in order to avoid meeting their full tax liability.

Because Facebook derives its revenue from online services conducted in part in France, the company is able to avoid paying their full tax liability by exploiting outdated tax legislation based on territorial grounds.

Due to such flaws, the French government has emphasized the need for new taxation rules that are more in line with how value is generated in the digital economy. France proposed that taxation be calculated at the international level based on the location of interaction with end users, while at the national level, France proposed the implementation of a transitory tax on data collection with the goal to promote innovation and promote good online practices (De Filippi, 2013).

Use of the unique internet based service Over the years, Facebook has extensively taken advantage of the distinctive characteristics of its internet-based service to avoid paying large amounts of tax. Most tax laws in the jurisdictions where Facebook has subsidiaries are designed for tangible goods rather than internet-based services. This has enabled Facebook to use it to avoid satisfying full tax liability in well-designed tax optimization schemes (Sievers, 2021).

Tax havens have become another extremely popular method of tax optimization. For the purpose of further considerations, it is worth outlining what a tax haven is, i.e., "a country where very low, symbolic income taxes apply or no income taxes are levied on companies at all (tax haven or offshore). Very simple and cheap conditions for registering companies are applied there" (Encyclopedia PWN).

According to the International Monetary Fund, the annual cost of legal entities investing their funds in tax havens plays a very significant role. Losses incurred by the government range from USD 500 to 600 billion per year. The amounts mentioned above are only the costs incurred by legal entities.

The amount of funds transferred to tax havens by individuals also plays a significant role. Their value oscillates around USD 200 million.55 To sum up, governments around the world lose around USD 750 million per year, which is a huge amount of funds escaping taxation (Shaxson, 2019).

Using tax heavens Facebook saved $5.8 billion in taxes over the period 2010 and 2015 by exploiting the stock option loophole. This implies that American taxpayers helped finance enormous salary packages for Mark Zuckerberg and other executives at Facebook.

Facebook additionally most likely evaded US taxes by arguing that $2.9 billion of the company's profits have been generated abroad and "permanently reinvested" outside the US. A portion of the company's offshore profits may be held by Facebook subsidiaries in well-known offshore tax havens such as Ireland and Singapore (ITEP, 2017).

Next way of corporate income tax optimization may be signing favorable tax deals with governments of individual countries. This is best exemplified by an article titled "Google's tax deal with the UK: key questions answered" that appeared in the Guardian on January 29, 2016. Google reached a £130 million agreement with the

British taxman, according to the article. The deal was described as a "major success" by George Osborne, according to the article. Despite the fact that Google described the deal as a huge success, it sparked debate about whether the British government was being too gentle with multinational corporations when it came to taxation.

The chancellor, on the other hand, insisted that Google's settlement was due to his redirected profits tax (DPT), which was announced last year to target multinationals that deliberately route profits overseas (Kamal, 2016).

Next example may be Apple Distribution International company, which pays just 2% tax on its profits because this special rate was negotiated with the Irish government. As a result, Apple pays no tax at all in the United States or elsewhere where it operates. By exploiting a legal loophole between the Irish and American tax jurisdictions, Apple, specifically Apple Operations International, did not pay approximately $30 billion in tax between 2009 and 2012, while Apple Sales International's $74 billion in income was taxed at a mere 0.05% rate.

4. European Union Regulators' Response to Corporate Income Tax Optimizations

Following the 2008 financial crisis, the European Commission and the OECD recognized that it was necessary to move ahead with overall CIT modernization. Following a request from the G20, the OECD began conducting research on base deterioration and profit shifting (BEPS) in 2013. In the EU, an initiative to combat tax fraud and tax evasion, as well as a package on tax transparency, were implemented in 2016, followed by the reinstated of the widespread established corporate tax base (CCCTB) project (Erdos, 2022; Balios *et al.,* 2021).

Unfortunately, the Corporate Income Tax regulations in European Union are still unable to regulate many issues related to tax avoidance. On the other side the authorities of individual countries and the European Commission strive to eliminate harmful tax practices by taking decisive action against corporate actions to the extent possible under applicable law (Liapis *et al.,* 2020).

An example is mentioned above case of Apple Corporation. The European Commission has found that Ireland granted Apple undue tax benefits worth up to €13 billion. This is illegal under state aid rules because it allowed Apple to pay significantly less tax than other companies. Ireland must now recover the illegal aid.

This selective tax treatment meant that Apple’s effective corporate tax rate on its European profits was 1% in 2003. By 2014, this had fallen to just 0.005% (Press communicate of EU Commission 30.08.2016). As a response for described above practices and because of ability to avoid paying actual tax (from internet advertising), France proposed that taxation be calculated based on the location of interaction with end-users (De Filippi, 2013).

As well, new solutions are being discussed in order to tax internet advertisement. Every online action is carried out from a particular physical point inside a particular nation on the Internet. It is technically possible to determine which country viewed and tapped on which ads on a website during a given tax year. An internet advertising tax would require an obligation on the part of the impacted online corporations to collaborate, collect, and communicate the required information.

The information collected might be used for taxation and the taxation of online advertising. The amounts charged for deals doing business via this country's IP addresses could be used as the basis of Google's online advertising taxation in a specific country (Fuchs, 2018).

Moreover in order to minimalize tax avoidance EU introduced Pillar II – global minimum tax. From 1 January 2024, the provisions of the Pillar II Directive introducing a global minimum tax came into force in many European Union countries. Pillar II is a package of regulations aimed at establishing a minimum 15% tax level. Large capital groups (achieving annual turnover above EUR 750 million) that have entities in their structures effectively taxed at a rate lower than 15% may be required to pay a top-up tax.

The new regulations may in particular apply to entities using tax reliefs such as the R&D and IP Box relief and conducting activities exempt from taxation within Special Economic Areas (Directive Pilar Two).

In many countries as well in Poland, the Ministry of Finance is trying to combat the transfer of activities to tax havens, which is why work has been undertaken to conclude agreements on the exchange of tax information with countries that apply harmful tax practices and offer taxpayers full bank secrecy.

5. Conclusion

Nowadays, many companies want to reduce their tax and business burdens. Business managers are increasingly looking for ways to keep as much money as possible for themselves. This is justified from the point of view of corporations, but not necessarily beneficial for the societies and countries in which these entities operate.

Tax avoidance by entrepreneurs has a negative impact on the countries in which they operate. It causes a reduction in fiscal revenues by millions or even billions dollars or EUR, which contributes to a significant reduction in the state budget. The very operation of such enterprises also generates social security costs, in which the state participates. After all, when a company avoids paying taxes, its employees continue to benefit from social security system, but the company practically does not participate the state budget.

In recent years, the international community has increasingly strived to create a fair system of corporate taxation to take into account the globalization of the economy. Unfortunately, tax regulations do not keep up with the organizational changes of large corporations, the challenges related to new technology services and their taxation. The new regulations are created as a response to a problem that occurred earlier.

Nevertheless, a positive trend is that new regulations are being developed and implemented not at the national but at the supranational level (such as Pillar II) and are to be applied in many countries in order to solve the problems described in this article.

6. Conflict of Interest

The authors declare that they have no known competing financial interests or personal relationships that could have appeared to influence the work reported in this paper.

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