International Tax Evasion and its Impact on Financial Transparency: A Case Study

التهرب الضريبي الدولي وتأثيره على الشفافية المالية: دراسة حالة

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Abstract

International tax evasion is still a serious problem that threatens economic justice and global financial openness. With an emphasis on tax havensjuri sdictions that provide little or no taxes and high degrees of secrecy this study investigates the strategies employed in tax evasion. Both individuals and multinational corporations (MNCs) can evade tax obligations by using these havens.

Common tactics include shell firms, which conceal real ownership; manipulation of permanent establishment (PE) rules to take advantage of legal loopholes; and transfer pricing, where MNCs modify internal transaction costs to shift profits to low-tax jurisdictions. Apple serves as an example of these techniques. Apple was able to lower its international tax rate to less than 4% by using Irish subsidiaries to route earnings and taking advantage of differences between Irish and U.S. tax laws, which led to an estimated.

Keywords: International tax evasion, tax havens, financial transparency, shell companies, Base Erosion and Profit Shifting (BEPS).

JEL Classification Codes: G1, F23,

ملخص:

لا يزال التهرب الضريبي الدولي مشكلة خطيرة تهدد العدالة الاقتصادية والانفتاح المالي العالمي. تركز هذه الدراسة على الملاذات الضريبية – وهي مناطق قضائية تفرض ضرائب منخفضة أو معدومة وتتميز بدرجة عالية من السرية – وتستقصي الاستراتيجيات المستخدمة في التهرب الضريبي. يمكن للأفراد والشركات متعددة الجنسيات على حد سواء التهرب من التزاماتهم الضريبية باستخدام هذه الملاذات.

تشمل السياسات الشائعة الشركات الوهمية التي تخفي الملكية الحقيقية، والتلاعب بقواعد المنشأة الدائمة للاستفادة من الثغرات القانونية، والتسعير التحويلي، حيث تقوم الشركات متعددة الجنسيات بتعديل تكاليف المعاملات الداخلية لتحويل الأرباح إلى مناطق قضائية ذات ضرائب منخفضة. تُعد شركة آبل مثالًا على هذه الأساليب. فقد تمكنت آبل من خفض معدل ضريبتها الدولية إلى أقل من 4% باستخدام شركات تابعة لها في أيرلندا لتوجيه الأرباح والاستفادة من الاختلافات بين قوانين الضرائب الأيرلندية والأمريكية، مما أدى إلى خفض معدل الضريبة الدولية المقدّر إلى أقل من 4%.

كلمات مفتاحية: التهرب الضريبي الدولي، الملاذات الضريبية، الشفافية المالية، الشركات الوهمية، تآكل القاعدة الضريبية ونقل الأرباح (BEPS).

تصنيفات JEL : G1, F23

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1. Introduction

International tax evasion has become a complicated and pervasive problem as a result of glob alization, threatening both financial justice and national economies.
Legal uncertainties, offshore financial hubs, and complex organizational structures are used b y corporations, affluent individuals, and even governments to avoid paying taxes, depriving c ountries of vital public resources.

The techniques of international tax evasion, its effects on the economy and society, and the fu nction of regulatory actions in combating it are all examined in this paper.
The study highlights the need for international tax changes to advance accountability, transpar ency, and equity in financial institutions by examining actual cases, such as Apple's calculated use of tax havens. "Non-cooperative jurisdictions," sometimes known as tax havens, are areas that have the freedom to create their own tax and financial regulations.
These jurisdictions draw people and companies looking to avoid.
This study addresses the following central question:

- What role do tax havens play in international tax evasion?

To answer this, the following hypotheses are proposed:

- Tax havens possess specific features that attract and assist individuals and entities in evading taxes globally.
- Modern international tax evasion heavily relies on tax havens**.**

Significance of the Study

This research aims to illuminate the complexities of international tax evasion, its global economic and social repercussions, and potential measures to enhance financial transparency and reduce evasion. Recognizing the systemic nature of tax evasion is essential for developing effective policies and fostering a fairer financial system**.**

Research Objectives

This study seeks to:

1. Examine tax evasion methods, including transfer pricing, profit shifting, shell companies, and PE rule exploitation.
2. Assess the economic and social impacts of tax evasion on public services and equity across nations.
3. Evaluate the effectiveness of current international tax policies, such as OECD guidelines and BEPS initiatives.
4. Analyze Apple’s tax strategies as an example of how MNCs exploit legal loopholes to minimize tax liabilities.
5. Propose solutions to improve transparency, enforcement, and global tax fairness.

2. Literature Review

Research on international tax evasion has evolved significantly over the past decades, encompassing both normative and empirical perspectives. Recent studies have increasingly focused on the ethical, regulatory, and institutional dimensions of tax compliance and

avoidance, particularly in the context of globalization and the rise of multinational corporations (MNCs).

2..1 Key Contributions in the Literature

Isnaini (2024) emphasizes the effectiveness of the Automatic Exchange of Financial Information (AEOI) in enhancing transparency and deterring tax evasion across jurisdictions. Stephanus (2023) focuses on the psychological drivers of tax compliance, highlighting the importance of taxpayer morale and perceptions of institutional legitimacy. Kumawat (2015) investigates tax evasion within the Bangladeshi context, identifying critical factors such as income levels, corporate governance, and regulatory enforcement. Benkraiem (2021) argues for the primacy of ethical business conduct, suggesting that internal corporate ethics may surpass formal audits in curbing tax evasion practices.

2.2 Comparative Framing and Study Contribution

This study aligns with and extends prior research in several ways:

- Transparency and Enforcement: Supporting Isnaini's (2024) analysis, our findings indicate that transparency mechanisms—such as AEOI—are undermined by weak enforcement and jurisdictional opacity, particularly in tax haven regimes.
- Institutional and Structural Drivers: While Stephanus (2023) focuses on behavioral responses, our study highlights the structural tools enabling evasion—such as shell companies, transfer pricing abuse, and permanent establishment (PE) manipulation—underscoring the importance of legal and institutional design.
- Global Perspective: Moving beyond Kumawat's (2015) national analysis, our work adopts a global lens, demonstrating how MNCs exploit international regulatory gaps to shift profits and minimize tax liabilities.
- Ethics Versus Legality: Echoing Benkraiem's (2021) emphasis on ethics, our case study of Apple illustrates how legally permitted tax minimization can conflict with societal expectations of fiscal fairness.
- Distinctive Contributions:
    - In-depth case study analysis (Apple Inc.) to contextualize theoretical insights.
    - Detailed assessment of international regulatory responses (e.g., BEPS, OECD guidelines).
    - Focus on specific evasion techniques and their systemic enablers.

2.3. Key Definitions of Tax Havens and International tax evasion:

A tax haven refers to a jurisdiction that attracts financial assets by offering politically stable conditions and favorable facilities, enabling individuals or entities to circumvent the tax laws, regulations, and rules of other jurisdictions. (Nicolas, 2011, p. 19), It is typically a country, microstate, or region where taxes on profits and income are either extremely low or

nonexistent. These jurisdictions draw in funds by capitalizing on this tax advantage. Additionally, they often provide another significant benefit: secrecy. This confidentiality is crucial for individuals or entities seeking to avoid taxes in their home countries, as it prevents local tax authorities from accessing information about these financial assets. (Diab, 2015, p. 5).

According to the Organization for Economic Cooperation and Development (OECD), a tax haven is "a country capable of financing its public services without imposing taxes on nominal income or by maintaining a very low tax rate, making it a destination used by non-residents to avoid taxes in their country of origin."

These characteristics represent what most tax havens share, but each tax haven has its own distinct features and uses. Some tax havens offer benefits for individuals, such as Monaco or Andorra, while others cater to legal entities, such as Jersey or the Bahamas. For example, many countries that are considered tax havens have varying levels of banking secrecy protection. In Switzerland – one of the most famous tax havens globally – the Swiss banking law is surrounded by absolute secrecy, and violating this secrecy is a criminal offense that warrants penalties such as imprisonment and hefty fines, in addition to professional exclusion or expulsion. However, this protection and secrecy can be lifted in rare and limited circumstances, such as investigations related to money laundering crimes (aliprandi, 2023, p. 15)

2.4 Countries classified as tax havens

Most economists agree that the first "real" tax haven was Switzerland, where Swiss banks have long served as a refuge for capital from individuals fleeing social unrest in Russia, Germany, South America, and other regions. In the early 20th century, in the years immediately following World War I, many European governments imposed heavy taxes to help finance reconstruction efforts after the destruction caused by the war. Generally, Switzerland remained neutral during the war and avoided rebuilding its infrastructure, which allowed it to maintain a low level of taxation. As a result, there was a significant flow of capital into the country for tax-related reasons

In 2000, the Organization for Economic Cooperation and Development (OECD) created an initial list of countries classified as tax havens, a list which has been modified over time. Currently, nine countries are included in the list that were not present in the original version.

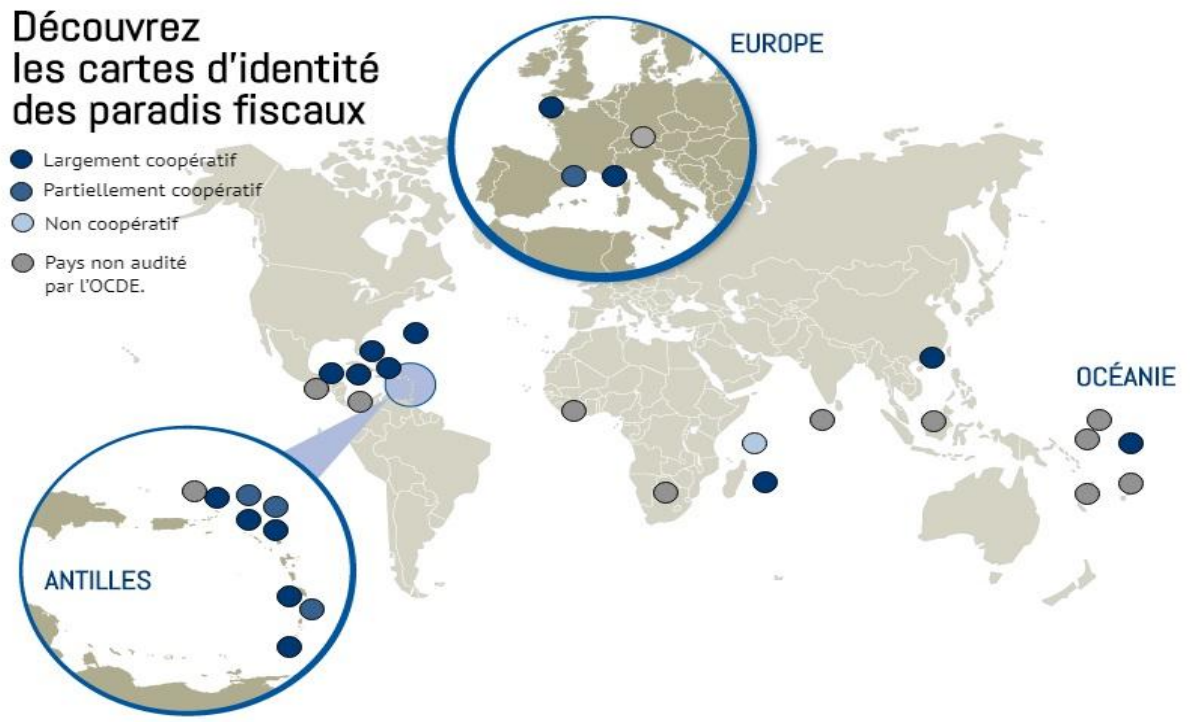
Table (01) shows the tax havens by geographical location, as classified by the OECD. This table includes 50 countries listed under various tax haven categories, arranged by geographical region.

region	Countries
Caribbean/West Indies	Anguilla, Antigua and Barbuda, Aruba, Bahamas, Barbados, British Virgin Islands ,Cayman Islands, Dominica, Grenada, Montserrat,a Netherlands Antilles, St. Kitts and Nevis, St. Lucia, St. Vincent and Grenadines, Turks and Caicos, U.S. Virgin Islands
Central America	Belize, Costa Rica, Panama
Coast of East Asia	Hong Kong, Macau, Singapore
Europe/Mediterranean	Andorra, Channel Islands (Guernsey and Jersey), Cyprus, Gibralter, Isle of Man, Ireland, Liechtenstein, Luxembourg, Malta, Monaco, San Marino. Switzerlanda,
Indian Ocean	Maldives, Mauritius, Seychellesa
Middle East	Bahrain, Jordan, Lebanona
North Atlantic	Bermuda
Pacific, South Pacific	Cook Islands, Marshall Islands, Samoa, Nauru, Niue, Tonga, Vanuatu
West Africa	Liberia

Source : Jane G.Gravelle, Tax Havens: International Tax Avoidance and Evasion, :Congressional Research Service, R40623, January 15th 2015, P 728

It is crucial to highlight that certain non-governmental organizations, such as the "Tax Justice Network," employ more stringent criteria for classifying jurisdictions compared to the Organisation for Economic Co-operation and Development (OECD). These organizations identify several countries, including the United States (specifically three states: Delaware, Nevada, and Wyoming), the United Kingdom, the Netherlands, Denmark, Hungary, Iceland, Portugal, and Canada, as exhibiting characteristics that categorize them as tax havens. This classification also encompasses smaller jurisdictions or regions within countries, such as Campione d'Italia, an Italian enclave situated in Switzerland.

While these countries are identified as tax havens, their classification within this category varies based on their participation in information exchange agreements or their commitment to uphold such practices, even in the absence of substantial changes in their implementation. According to the OECD framework, tax havens are segmented into three categories: the "White List," which includes jurisdictions that fully comply with internationally agreed standards; the "Gray List," which comprises countries that have made commitments to these standards but have yet to implement the required reforms; and the "Black List," which consists of jurisdictions that neither adhere to nor implement these standards. The subsequent diagram presents the global distribution of tax havens and their classification according to these criteria.



Source : Marine Rabreau, Les chiffres affolants de l'évasion fiscale dans le monde, publié le 04/04/2016 disponible sur http://www.lefigaro.fr/economie/le-scan-eco/dessous-chiffres/2016/04/04/29006-20160404ARTFIG00270-les-chiffres-affolants-de-l-evasion-fiscale-dans-le-monde.php

2.5. International tax evasion :

is a practice aimed at benefiting from the privileges or evading the tax system of a specific country, without explicitly violating legal provisions, by distorting the reality of financial transactions.

Tax evasion typically involves a well-planned and calculated escape from the responsibilities of duty, often accompanied by a sinister preparation for the potential of non-punishment. It significantly harms the integrity of the tax system.

International Tax Evasion refers to the illegal act of deliberately avoiding paying taxes through the use of strategies that exploit gaps or loopholes in international tax laws, often involving the concealment of income or assets across different jurisdictions. (Alex Cobham, 2020, p. 85)

2.6. Mechanisms of International Tax Evasion

Apart from the use of tax havens, which will be discussed in detail in Section Three, tax evaders at the international level also employ the following mechanisms:

2.6.1 Transfer Prices

A transfer price is the price set for transferring or selling goods between related companies, or

between the parent company and its subsidiaries in international markets. It also refers to the price set for selling goods between members of the same company family.

Tax evasion is carried out using transfer prices as follows:

- If a subsidiary or branch of a multinational company sells inputs to another subsidiary or branch of the same company in a different country, market prices are not considered in this situation. Instead, the parent multinational company and its foreign branches record the prices of transactions between them arbitrarily in their accounting books, leaving room for price manipulation.
- Manipulation of the taxable base before profit distribution, either by increasing or decreasing expenses on the part of the parent company, takes advantage of the differences in tax systems across countries. This allows the company to reduce expenses and, in turn, increase the taxable base in low-tax jurisdictions, and vice versa in countries with stricter tax systems.
- Profit distribution is carried out through the creation of intermediary companies by the parent company. These financial companies hold the profits generated by other companies, then transfer them back to the parent company under more favorable conditions based on the needs of the group, thus evading the high tax rate in the parent company's country.

2.6.2 Permanent Establishment (PE)

The concept of a Permanent Establishment (PE) has emerged recently and gained more prominence with the rise of multinational corporations, which use this structure to reduce their tax burden. The issue of multinational companies being subject to taxation and avoiding the phenomena of double taxation or international tax evasion required a solution at this level. As a result, international tax law has settled on an important principle: "The profits of foreign companies should not be taxed in the host country unless they result from a specific organization called a Permanent Establishment." The term "Permanent Establishment" refers to a fixed place of business through which the parent company carries out all or part of its operations. (Dillon, 2017, p. 280)

Multinational companies evade international taxes using the Permanent Establishment in one of the following ways:

- The parent company may establish its Permanent Establishment in a country that exempts the establishment from taxes altogether.
- Alternatively, if the company creates the Permanent Establishment in a country that does not exempt it from taxes or offer tax advantages, the company may give the establishment a false designation by dividing it into economic units in different regions, each performing a specific activity (services, coordination, distribution, etc.). When each of these units is considered independently, they do not constitute a

Permanent Establishment, and therefore, the profits generated by them are not **subject** to taxation, allowing the parent company to reduce its tax burden.

2. 6.3 Tax Havens and Their Role in Global Tax Evasion Schemes

Tax evasion via tax havens is facilitated through several key methods, including: (Dhaferi, 2020, pp. 85-87)

❖ Use of Shell Companies (Intermediary/Masking Entities)

Shell companies—referred to as *écrans*, *relais*, or *trusts* in tax havens—serve as the backbone of international tax evasion structures. These entities act as intermediaries, consolidating revenues while obscuring the identities of the true beneficiaries from tax authorities in high-tax jurisdictions. Key features include:

- Registration in Low/No-Tax Jurisd ictions: The company is incorporated in a tax haven with minimal or zero taxation.
- Control from High-Tax Countries: Despite being registered offshore, actual ownership and management remain with individuals or entities in high-tax countries.
- Profit Shifting: Revenue is artificially redirected from the parent company to the shell entity, avoiding taxation in the home country.

Challenges: Detecting the real owners is difficult since tax haven registrations use fictitious addresses, while operational control remains in the home country.

❖ Cost Manipulation Strategies

Companies minimize taxable income in high-tax jurisdictions by inflating expenses (e.g., royalties, interest, or service fees) attributed to tax haven entities. This artificially reduces profits subject to higher taxes.

❖ Profit Retention & Reinvestment

Instead of repatriating profits to the parent company (triggering high taxes), earnings are:

- Reinvested within the tax haven.
- Transferred to other low-tax jurisdictions.

❖ Profit Shifting via Artificial Transactions

Multinational corporations (MNCs) exploit intra-company transactions to shift profits:

- Transfer Pricing: Subsidiaries "charge" inflated fees for goods/services to relocate profits to tax havens.
- Special Purpose Entities (SPEs): Offshore vehicles enable tax avoidance through

mechanisms like circular investments, where funds flow through shell companies to disguise taxable income.

❖ Wealth Concealment by Individuals

High-net-worth individuals (HNWIs) evade taxes by:

- Registering assets (stocks, bonds, real estate) under tax haven entities.
- Channeling income through offshore structures to avoid inheritance or capital gains taxes.

❖ Branch Manipulation

MNCs establish nominal branches in tax havens to:

- Artificially attribute profits to low-tax jurisdictions.
- Benefit from secrecy laws, reduced operational costs, and streamlined incorporation.

3. Approach

The topic of worldwide tax evasion and its consequences for financial transparency are exami ned in this study using a qualitative case study methodology.
The actual instance of [Company/Country], which has been frequently mentioned in news abo ut aggressive tax strategies like the "Double Irish with a Dutch Sandwich," is the subject of th e study. The approach entails a thorough examination and evaluation of:
official tax filings and financial reports of multinational firms using tax planning techniques.
databases and reports from global organizations such national tax agencies, the European Tax Observatory, and the OECD.

International taxes and information sharing are governed by legal and regulatory texts.
scholarly works on global financial justice, transparency, and tax evasion.
The case study approach is especially appropriate since it permits a
comprehensive and contextualized knowledge of the ways in which corporate tactics, legal fra meworks, and regulatory flaws combine to facilitate tax evasion.
Thematic analysis of the data focuses on trends in behavior, legal gaps, and the efficiency of tr ansparency measures.

4. Case Study Presentation: Apple's international tax evasion through tax havens

In the late 1980s, Apple set up Irish subsidiaries consisting of holding companies with no operations or employees. The companies claimed residency in a tax haven and earned royalty fees from the licensing of intellectual property. Profit was routed through these companies via other holding companies, taking advantage of preferential tax treaties to ensure that minimal taxes were incurred. Apple’s foreign sales, which accounted for 60 per cent of its profits, were

largely routed to Ireland through these structures. The Congressional investigation did not allege that Apple's tax practices were illegal. In fact, Apple found loopholes in the tax laws and took advantage of them

Back in 2013, the U.S. Senate's Permanent Subcommittee on Investigations (PSI) presented a thorough and compelling report showing that Apple had taken advantage of loopholes in the tax code. By entering into so-called "cost-sharing agreements" with barely-there Irish subsidiaries, Apple managed to legally—but ethically questionably—avoid paying tens of billions of dollars in U.S. income taxes. Then, in the fall of last year, the European Commission concluded that Apple's use of its Irish branch constituted a sophisticated profit-shifting scheme—one that was not only unethical but also illegal.

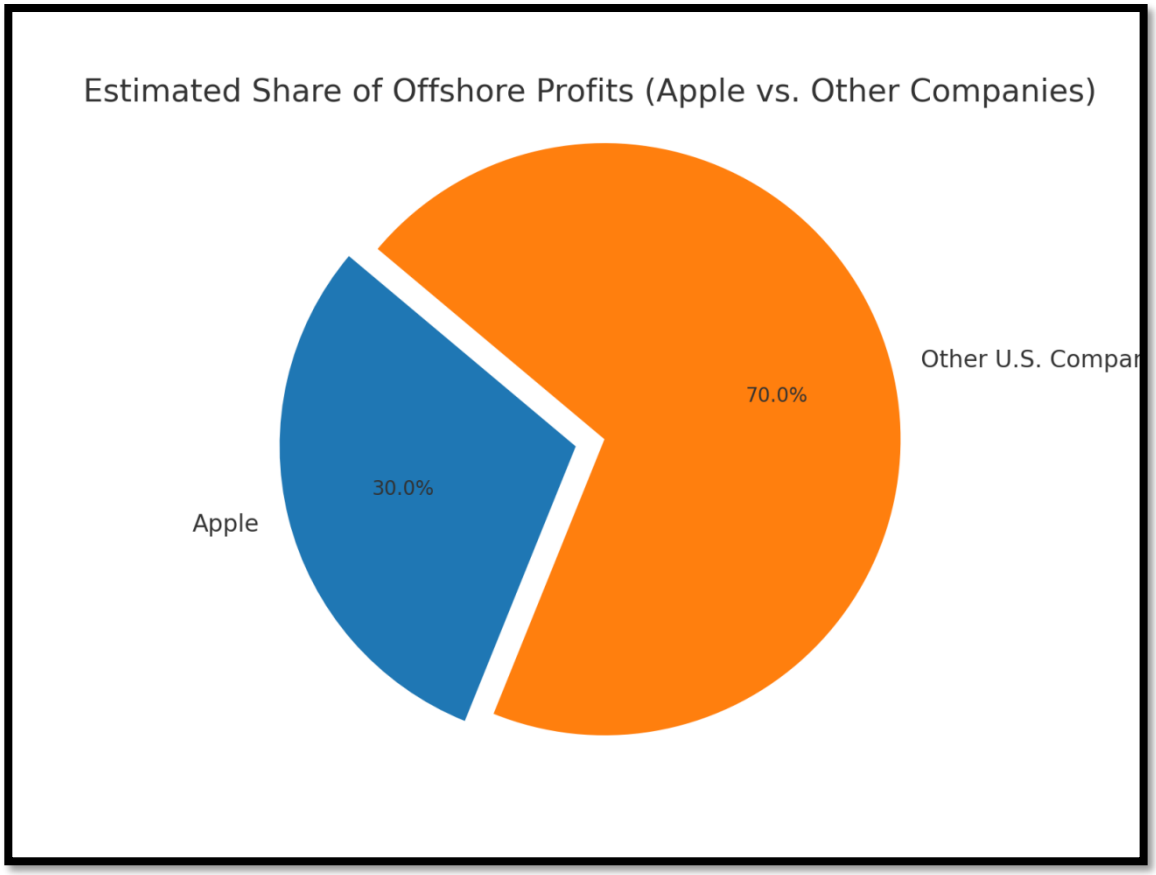
But even without an in-depth investigation, it's clear that Apple has been avoiding taxes on its offshore income—because the company has openly disclosed it. According to Apple's most recent 10-K filing, it has paid a foreign tax rate of under 4 percent on its offshore profits. This implies that Apple owes the U.S. government approximately $75 billion in unpaid taxes on that income.

It is within this context that lawmakers should consider the current proposal—endorsed by Congressional leadership and President Donald Trump—to grant a "tax holiday" for companies hoarding profits overseas. While many corporations are holding portions of the over $2.6 trillion in offshore earnings, Apple's share is the largest by a significant margin. Given Apple's minimal foreign tax payments, it stands to gain the most from such a holiday. In essence, the company that has long enjoyed a self-created tax holiday would now be handed an official one by the U.S. government.

5. Analysis and Discussion

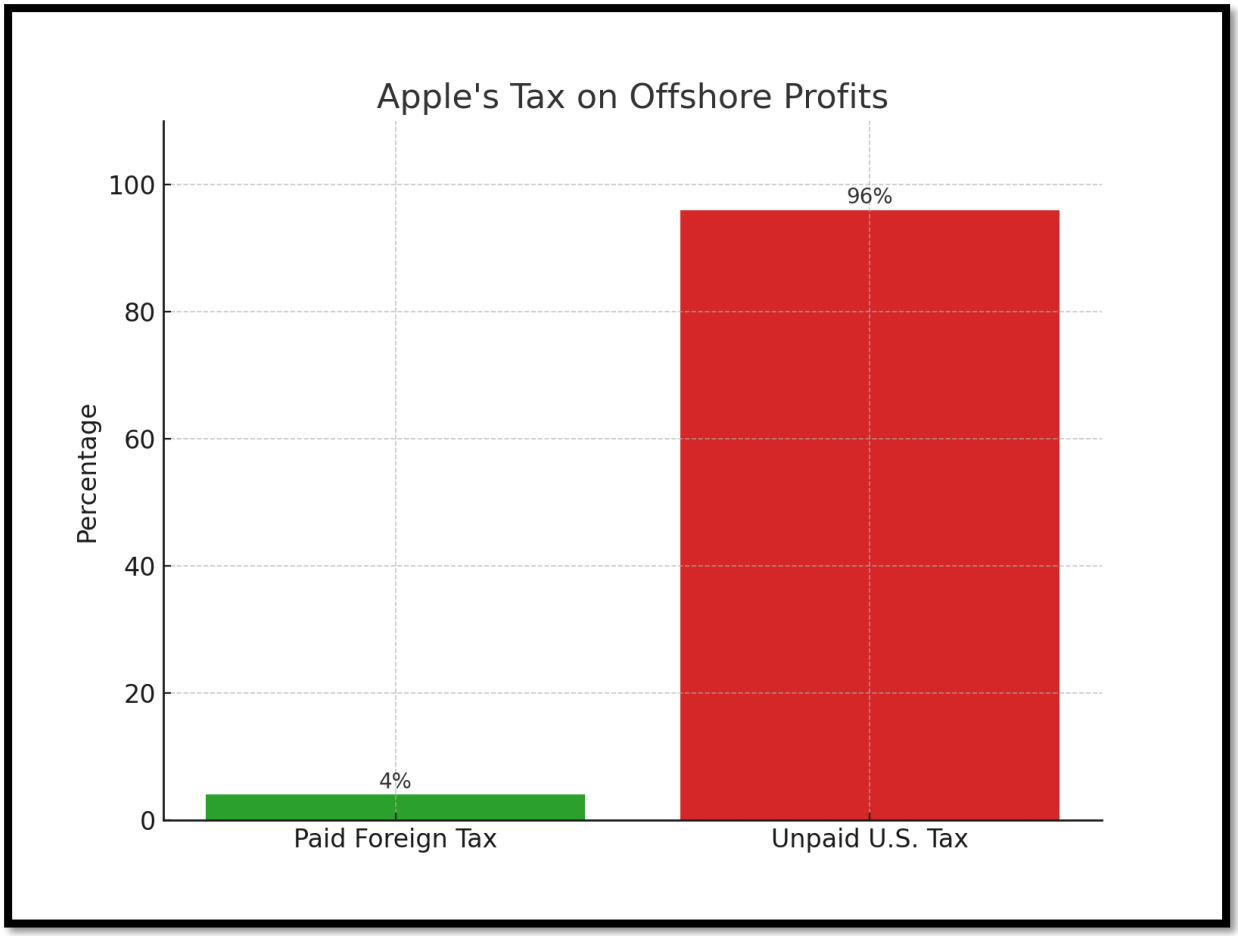
The question isn't whether Apple has outmaneuvered policymakers so far—it clearly has. CEO Tim Cook has skillfully used public relations to frame Apple as a victim of an outdated corporate tax system, while dismissing the findings of the PSI and the European Commission as "political nonsense." Yet, he has provided no substantive rebuttal to the detailed allegations of tax avoidance.

The real issue is whether Congress will continue to be misled. Rather than granting another tax holiday, lawmakers could hold Apple accountable by ending the deferral of taxes on foreign earnings—ensuring that Apple and other multinationals pay what they owe. This move would immediately boost federal revenues and help restore public confidence in a tax system often perceived as being tailored to serve powerful corporate interests. On the other hand, if Congress follows President Trump's lead and rewards Apple's long-standing tax avoidance with further breaks, it will only deepen public cynicism—and rightfully so.



Prepared by the researcher based on company data

This chart represents a rough estimate of Apple's share of the total foreign earnings of US companies. Apple's share is estimated at approximately 30% of the more than $2.6 trillion in earnings held abroad, the largest share of any US company.



Prepared by the researcher based on company data

Comparison of Taxes Paid and Unpaid: This chart shows that Apple paid less than 4% in foreign taxes on its foreign profits, while it paid 96% in US taxes, equivalent to approximately $75 billion in unpaid taxes

After the European Commission Ordered Apple to Pay Back Taxes to Ireland: Ireland's Future in the New Global Tax Environment

On August 30, 2016, the European Commission directed Ireland to recover $14.5 billion, plus interest, in unpaid taxes from Apple Inc. for the period between 2003 and 2014. The Commission argued that Ireland had granted Apple preferential tax treatment—commonly referred to as "sweetheart deals"—in return for job creation, and determined that these arrangements amounted to illegal state aid, in violation of EU competition laws.

Key issues at the heart of this case include profit shifting and the manipulation of transfer pricing—practices that have long shaped Ireland's corporate tax structure and its role within global tax policy discussions. This note outlines the European Commission's ruling on Apple and examines its potential impact on Ireland's international relations and domestic legal reforms, which may be necessary for Ireland to align with both EU regulations and broader international tax standards.

The Apple decision has served as a catalyst for dialogue among the United States, the European Union, and Ireland, encouraging greater cooperation in the fight against tax avoidance on a global level. It is anticipated that international tax reform efforts will continue to gain momentum, aiming to prevent illicit arrangements between multinational corporations and individual nations (IndianaUniversity, 2018, p. 539).



"Apple's Seaward Property Reflect Vital Charge Arranging"

This bar chart highlights the dissemination of Apple's seaward accounts in 2015, appearing noteworthy reserves held exterior the Joined together States. Nations like Ireland and Switzerland, known for their moo corporate assess rates (12.5% and 17.9% separately), played a central part in Apple's worldwide assess methodology. These seaward structures permitted Apple to legitimately diminish its U.S. charge liabilities whereas keeping up get to to worldwide markets

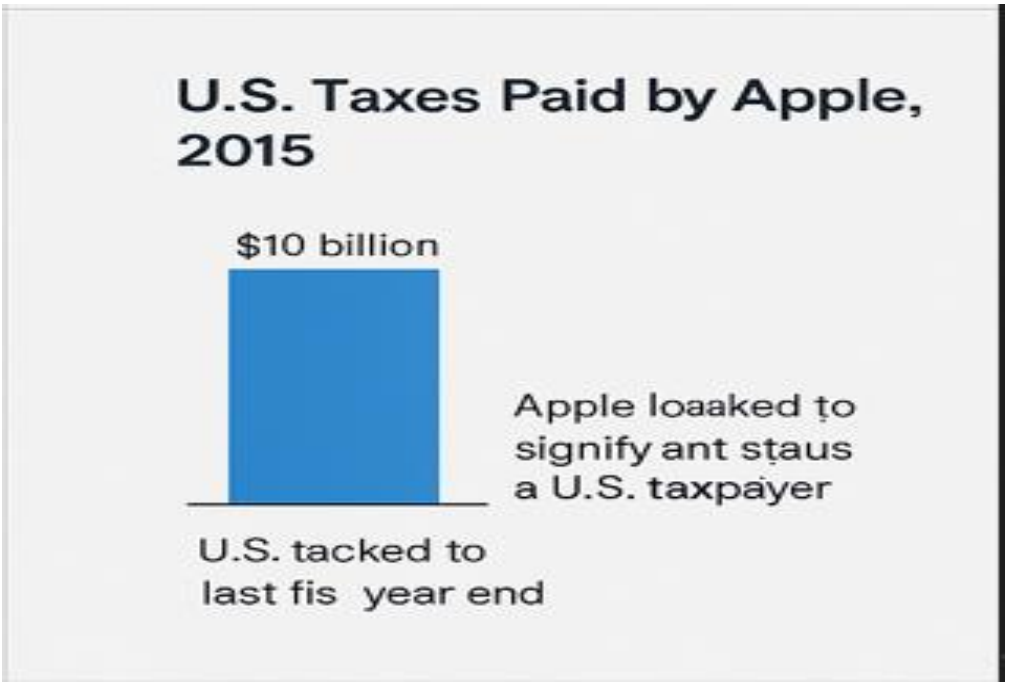


"Ireland's Decision to Close the 'Double Irish' Loophole"
This timeline illustrates Ireland's phased approach to shutting down the controversial 'Double Irish' tax loophole. While new companies were restricted from using the structure immediately, existing companies were allowed to continue benefiting from it until 2020. The move followed international pressure to curb aggressive tax avoidance by multinational corporations.



"Apple's $50 Billion Share Buyback Initiative"
Apple's strategy choice to increase shareholder value through a significant capital return progr am is depicted in this pie chart.
The business set aside $50 billion, or 50% of the program, expressly for share repurchases in 2015.

Apple funded this project by issuing debt and using interest deductions to lower its U.S. tax b urden because it was unable to repatriate overseas cash.



"Apple's $10 billion U.S. assess installment in 2015 highlights its part as a major donor to the economy. Whereas this underscores their budgetary affect, it moreover raises vital discourses almost corporate charge duties and straightforwardness. A update of how huge enterprises navigate and shape fiscal scenes .

Findings of the Study

1. How Tax Havens Contribute to Global Tax Evasion
   According to the study, tax havens, which provide low- or zero-
   tax nations with high financial secrecy, are crucial in enabling worldwide tax evasi on.
   Because of their advantageous tax laws, which permit profit shifting and tax evasi on in their home nations, these jurisdictions draw both individuals and multination al corporations (MNCs).
2. Tax Evasion Mechanisms: Transfer Pricing: To move earnings to low-tax jurisdictions, multinational corporations (MNCs) alter internal transaction pricing between subsidiaries.
   Shell Companies: In tax havens, using paper corporations hides real ownership and evades taxes. Manipulation of Permanent Establishment (PE): Taking advantage of legal snags in the definition of a "permanent establishment" in order to avoid paying taxes.
   Social and Economic Effects :
   Every year, both developed and developing countries lose billions of dollars in

public revenue, which makes it more difficult for them to pay for basic public services like healthcare and education.
Enhanced Inequality: Social imbalances are made worse by the concentration of wealth among those taking advantage of tax breaks.

3. Shortcomings in Current Administrative Systems
   - In spite of activities just like the OECD's BEPS (Base Disintegration and Benefit Moving), holes hold on due to non-compliance and insufficient enforcement instruments.
   - There's a squeezing require for upgraded straightforwardness, such as programmed trade of budgetary data between countries.. Apple Case Ponder
   Apple abused lawful holes in Irish and U.S. assess laws, lessening its remote charge rate to underneath 4% and denying the U.S. of around $75 billion in charge income.
   - The case underscores the need for worldwide charge changes to control "legitimate" assess shirking by MNCs.

6.Conclusion

International tax evasion has become a systemic problem in a period of growing globalization, endangering economic stability and financial equality. This study demonstrates how multinational firms and tax havens use complex strategies to shift profits and evade taxes, including PE manipulation, transfer pricing, and shell companies, depriving governments of essential funding for sustainable development.
Even though global initiatives like BEPS are a step in the right direction, current measures are still insufficient to overcome legal loopholes and ensure transparency without further cooperation.

The Apple case is a prime example of how big businesses take advantage of tax laws, with society suffering as a result of diminished public services and growing inequality.
To ensure that all economic entities, particularly large multinational corporations, participate equitably, fighting tax evasion ultimately requires strong political will, stronger rules, and efficient oversight. Only by working together globally can financial
Achieving transparency will protect the public interest for both present and future generations.

7.Bibliographie

Alex Cobham, P. J. (2020). International Corporate Tax Avoidance. *Estimating Illicit Financial Flows: A Critical Guide to the Data, Methodologies, and Findings*.

aliprandi, g. (2023, 12). Consulté le 12 27, 2024, sur https://www.taxobservatory.eu/

Benkraiem, R. e. ((2021). “Ethical behavior, auditing strength, and tax evasion: A worldwide perspective. *Journal of International Accounting, Auditing and Taxation*, 380.

BURGER, J. (2011). les délits pénaux fiscaux : une mise en perspective des droits français, luxembourgeois et internationaux. *thèse de doctorat,*. université Nancy 2.

Dhaferi, R. &. (2020). Tax Havens and their Role in International Tax Evasion Case of the Google’s Double Irish, Dutch sandwich. *Finance and Business Economies Review*, 85-87.

Diab, O. (2015). *Tax Judge A New Nail in Social Justice.* Cairo: Economic and Social Justice Unit,.

Dillon, S. (2017). Tax Avoidance, Revenue Starvation and the Age of the Multinational Corporatio. *The International Lawyer*, 280.

IndianaUniversity. (2018). After the European Commission Ordered Apple to Pay Back Taxes to Ireland: Ireland's Future in the New Global Tax Environment. *Indiana Journal of Global Legal Studies*, 539.

Isnaini Isnaini, J. E. (2024). Automatic Exchange of Financial Information from the Perspective of Tax Fairness and Transparency. *Jurnal Penelitian Pendidikan Indonesia*.

Kumawat. (2015). Tax Avoidance and Evasion in Emerging Economies: A Comparative Analysis. *economics*, 204.

Nicolas, S. (2011). *treasure islands tax havens and the men who stole the world.* New YORK, USA: Palgrave Macmillan.

Stephanus, R. W. (2023). Preventing Tax Evasion: The Moral Strength of Taxpayers and The Power of Tax Authorities. *Jurnal Akuntansi dan Keuangan*.