Beneficial Ownership of Royalties in Bilateral Tax Treaties

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**Abbreviations**

- OECD: Organisation for Economic Co-operation and Development
- WIPO: World Intellectual Property Organisation
6.3 Interpretation of beneficial ownership with reference to international law

6.3.1 Article 5(2) of the OECD Model

6.3.2 International tax meaning of beneficial ownership

6.3.2.1 Hypothetical transaction

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