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The phenomena of increasingly global business enterprises with valuable intangible property expose companies to transfer pricing enforcement by different countries around the world. Many of these countries are increasingly aggressive in enforcing their local transfer pricing rules, as they attempt to protect their tax revenue base. To avoid double taxation of the same income in this environment, companies often are required to deal with the highly specialized, bilateral treaty-based competent authority process developed to prevent double taxation at a time when trade mainly involved only two established countries. Even more challenging today, companies and tax authorities increasingly are faced with the potential for multiple taxation of the same income, as supply chains cross many borders and as the tax authorities of emerging countries become players in the global taxation process, and the resulting stresses, strains, and limitations of the bilateral treaty-based competent authority process have become more apparent. In light of the high-dollar risks presented by the increased enforcement efforts of tax authorities worldwide, the complexity of the ever-changing, inherently uncertain transfer pricing standards, and the continually evolving business models of businesses adapting to the constantly changing global economy, companies need practical guidance to permit them to develop and defend their transfer pricing strategies.

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Transfer Pricing Answer Book 2015 gives companies such guidance by discussing all aspects of transfer pricing, from initially planning a transfer pricing strategy, to alternative ways to defend the strategy from attack by two or more tax authorities, to resolving a case before competent authorities, to bringing a transfer pricing case to court. The book's non-technical discussion is presented in a question and answer format that will appeal to readers regardless of their prior level of experience or familiarity with taxes in general and transfer pricing in particular. Transfer Pricing Answer Book 2015 is an invaluable resource for company executives and their advisors who are seeking to better understand this important area of tax law that has become such an important economic facet of so many businesses."

Here is a new, updated edition of the popular legal research tool depended upon by thousands of legal students, law professors, law librarians, practitioners and paralegals. Greatly simplifying and streamlining the search for legal materials, it serves the law student who needs a starting point or bibliography to do research, the lawyer or paralegal who has a case on a subject that is new, and the experienced practitioner who may have missed a publication on a well-known topic. Professors should find Searching the Law locates materials helpful to them, while lay persons should find it an excellent place to begin. It should assist the librarian who needs to augment a particular subject area of the collection, or to open a new area.

Derived from the renowned multi-volume International Encyclopaedia of Laws, this

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book describes the social security regime in Slovenia. It conveys a clear working knowledge of the legal mechanics affecting health care, employment injuries and occupational diseases, incapacity to work, pensions, survivors' benefits, unemployment benefits and services, and family benefits. The analysis covers the field of application, conditions for entitlement, calculation of benefits, financing, the institutional framework, and relevant law enforcement and controls. Allowances for retirees, employees, public sector workers, the self-employed, and the handicapped are all clearly explained, along with full details of claims, adjudication procedures, and appeals. Succinct yet eminently practical, the book will be a valuable resource for lawyers handling social security matters in Slovenia. It will be of practical utility to those both in public service and private practice called on to develop and to apply social security law and policy, and of special interest as a contribution to the comparative study of social security systems.

BPP Learning Media provides comprehensive materials that highlight the areas to focus on for your exams and complement the syllabus to increase your understanding. The OECD's Base Erosion and Profit Shifting (BEPS) project promises to make effective inroads into the much criticized corporate tax strategy known as aggressive transfer pricing, whereby the profitability of subsidiaries in different jurisdictions is "managed" via mispricing with the intent of minimizing the corporation's overall tax burden. Although the OECD BEPS project is an ongoing endeavor, its

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accomplishments to date and developing trends are discernible. This book, including contributions by outstanding and renowned transfer pricing experts both from practice and academia, analyses these trends, and proposes reforms which would ensure that transfer pricing outcomes are better aligned with economic activities and value creation, which achieves a more equitable distribution of profits among different countries. Each chapter is dedicated to specific sections of the OECD's BEPS Action Plan. Among the topics and issues covered are the following: – arm's length principle and its ongoing development; – allocation of risk and recharacterization; – intangibles (both license model and cost contribution arrangements); – interest deductions and intra-group financing; – low value-adding services; – commissionaire arrangements and low-risk distributors; – attribution of profits to permanent establishments; – documentation requirements (including Country-by-Country Reporting). Within these topics, measures to identify the commercial and financial relationships inside multinational enterprises, to accurately delineate actual transactions, as well as guidance on defining risk and its allocation among entities of a multinational enterprise are discussed. The book is based on papers presented and discussed at the first Global Transfer Pricing Conference hosted in February 2016 by the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law at WU (Vienna University of Economics and Business). The most up-to-date and thorough consideration of transfer pricing yet published, this book will prove invaluable for all parties currently facing questions related to transfer pricing

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in a post-BEPS world, especially those in charge of finding an ideal answer to them: academics, practitioners (including in-house and advisory counsel), international organizations, CEOs and CFOs of multinational enterprises, and government officials who are tax and transfer pricing experts.

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For multinational corporations (MNCs), there is arguably no more important operational function that affects all areas of manufacturing, marketing, management, and finance as international transfer pricing--the practicing of supplying products or services across borders from one part of the organization to another. Its complexity is compounded by the impact of e-commerce, speeding the flow of goods and services; "intangible" assets, such as intellectual property, whose value is difficult to quantify; and the activities of policymakers around the world to update their laws and regulations, in efforts to close loopholes that have historically encouraged tax avoidance. Abdallah provides an in-depth overview of these recent trends and developments, and offers practical insights for creating transfer pricing systems that maximize value for the company while remaining sensitive to local policies in all of the countries in which it operates.

This publication is a response to the need, often expressed by developing countries, for clearer guidance on the policy and administrative aspects of applying transfer pricing analysis to some of the transactions of multinational enterprises (MNEs) in particular. Such guidance should not only assist policy makers and administrators in dealing with complex transfer pricing issues, but should also assist taxpayers in their dealings with tax administrations. Without an effective response to transfer pricing issues, profits earned in one jurisdiction

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might appear to be shifted to another jurisdiction. This may have the net effect of minimising tax revenues in a country where economic activity of the MNE takes place, and therefore the ability to finance country's development.

This is a user-friendly and extremely accessible text to guide students through the series of possible steps in strategy making.

The phenomena of increasingly global business enterprises with valuable intangible property expose companies to transfer pricing enforcement by different countries around the world. Many of these countries are increasingly aggressive in enforcing their local transfer pricing rules, as they attempt to protect their tax revenue base. To avoid double taxation of the same income in this environment, companies often are required to deal with the highly specialized, bilateral treaty-based competent authority process developed to prevent double taxation at a time when trade mainly involved only two established countries. Even more challenging today, companies and tax authorities increasingly are faced with the potential for multiple taxation of the same income, as supply chains cross many borders and as the tax authorities of emerging countries become players in the global taxation process, and the resulting stresses, strains, and limitations of the bilateral treaty-based competent authority process have become more apparent. In light of the high-dollar risks presented by the increased enforcement efforts of

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A comprehensive guide to corporate practices in internal control and tax compliance. Included are case studies of how firms in a variety of industries approach transfer pricing.

Advanced praise for Transfer Pricing Methods "Feinschreiber and a team of

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renowned executives have provided the definitive transfer-pricing guide to this challenging area. At a time when many companies are reviewing documents, policies, and procedures, it's wonderful to have a concise, clearly written reference focused on what may be the most critical corporate tax issue." -Charles R. Goulding, Managing Director, Tax Cooper Industries, Inc. "It is refreshing to find a treatise on transfer pricing that combines practical business considerations, economic theory, and a discussion of technical tax rules in a way that is meaningful not only for large corporate enterprises but also small and medium-sized businesses." -Vikram A. Gosain, JD, CPA, Director of Transfer Pricing General Electric Capital Corporation "This well-written book will be useful both to attorneys new to the practice area and to older hands. It includes very helpful discussions on valuation issues that will be particularly useful for in-house counsel and accountants." -Joseph C. Mandarino, Partner Troutman Sanders, LLP "Feinschreiber and his contributors have cogently explained hundreds of useful facets in the transfer pricing field that have taken others volumes to articulate. The busy professional should consider this book in his or her quest for knowledge in this scintillating tax specialty." -Charles L. Crowley, Partner ITS/Customs and International Trade Practice, Ernst & Young, LLP "Transfer Pricing Methods . . . should become a standard tool for every owner-managed

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and mid-cap multinational." -Enrique MacGregor, Principal-in-Charge, Transfer Pricing Services Grant Thornton LLP "Bob's vast experience in transfer pricing matters has again been captured between the covers of a book. Thank you, Bob, and your contributing colleagues, for producing another valuable helpmate." -Alan Getz, Vice President and General Manager, Tax Mitsui & Co., Inc. (U.S.A.) "Feinschreiber's current publication is a practical handbook that presents transfer pricing tools that can assist tax professionals of mid-sized companies to optimize profits, manage cash flows, and moderate taxes in a defensible manner." -Per H. Hasenwinkle, National Practice Leader, Transfer Pricing BDO Seidman, LLP

When you think of marketing you may think of the adverts that pop up at the side of your screen or the billboards you see when you're out - all those moments in the day when somebody is trying to grab your attention and sell you something! Marketing is about advertising and communications in part, but it's also about many other things which all aim to create value for customers, from product research and innovation to after-care service and maintaining relationships. It's a rich and fascinating area of management waiting to be explored - so welcome to Marketing! Jim Blythe's Principles and Practice of Marketing will ease you into the complexities of Marketing to help you achieve success in your studies and get the best grade. It provides plenty of engaging real-life examples, including brands you know such as Netflix and PayPal - marketing is

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not just about products, but services too. Marketing changes as the world changes, and this textbook is here to help, keeping you up to speed on key topics such as digital technologies, globalization and being green. The companion website offers a wealth of resources for both students and lecturers and is available at www.sagepub.co.uk/blythe3e. An electronic inspection copy is also available for instructors.

National tax authorities individually determine multinational firms' country-specific tax liabilities by applying one or more sanctioned transfer pricing methodologies. These methodologies are founded on basic assumptions about market structure and firm behavior that are rarely empirically valid. Moreover, for the most part, the transfer pricing methodologies now in vogue were developed before the Internet became a dominant factor in the world economy, and hedge and private equity funds transformed financial and commodities markets. For these reasons, multinational firms are unable to accurately anticipate their tax liabilities in individual countries, and remain at risk of double taxation. Uncertainties in corporate tax liability are extremely costly, both for individual corporations and from an economy-wide perspective. Firms pay exorbitant fees to have tax attorneys, accountants and economists prepare the documentation required by tax authorities to substantiate their intercompany pricing practices and defend their tax positions on audit. Corporate tax liabilities are also potentially much higher than they would be under a more transparent and predictable transfer pricing

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regime (due to the potential for double taxation and penalties), and investors' returns are reduced accordingly. The FASB's Interpretation No. 48, Accounting for Uncertainty in Income Taxes (released on July 13, 2006), has motivated multinational firms to increase their reserves substantially (in many cases at the insistence of their auditors), reducing the total funds available for productive investment. 1 The current transfer pricing regimes are embodied in the OECD Guidelines, individual OECD member countries' interpretations thereof, the U. S.

This book is an adaptation of the successful US text Cost Management by Hilton, Maher and Selto, written specifically for an international audience. Major improvements include: Diverse and truly international examples of organizations - Examples used throughout the book are from all over the world and represent manufacturing, retail, not-for-profit, and service firms in many different countries. Completely restructured and rewritten text - The book has been rewritten, restructured and also shortened significantly to align content closer with international courses. Integral use of spreadsheets - Spreadsheet software is used for explaining techniques and making applications more realistic. In depth research - Summaries of international research studies that address important cost management issues have been updated and more references to recent research findings have been added. Intuitive explanation of accounting - The authors show directly how events impact the balance sheet and profit and loss account.

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Valuing Intellectual Capital provides readers with prescriptive strategies and practical insights for estimating the value of intellectual property (IP) and the people who create that IP within multinational companies. This book addresses the crucial topic of taxation from a rigorous and quantitative perspective, backed by experience and original research that illustrates how large corporations need to measure the worth of their intangible assets. Each method in the text is applied through the lens of a model corporation, in order for readers to understand and quantify the operation of a real-world multinational enterprise and pinpoint how companies easily misvalue their intellectual capital when transferring IP rights to offshore tax havens. The effect contributes to the issues that can lead to budgetary crises, such as the so-called “fiscal cliff” that was partially averted by passage of the American Taxpayer Relief Act on New Year’s day 2013. This book also features a chapter containing recommendations for a fair and balanced corporate tax structure free of misvaluation and questionable mechanisms. CFOs, corporate auditors, corporate financial analysts, corporate financial planners, economists, and journalists working with issues of taxation will benefit from the concepts and background presented in the book. The material clearly indicates how a trustworthy valuation of intellectual capital allows a realistic assessment of a company’s income, earnings, and obligations. Because of the intense interest in the

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topic of corporate tax avoidance the material is organized to be accessible to a broad audience.

A comprehensive thematic analysis of capital flight from Africa, it covers the role of safe havens, offshore financial centres, and banking secrecy in facilitating illicit financial flows and provides rich insights to policy makers interested in designing strategies to address the problems of capital flight and illicit financial flows.

In the wake of the Panama Papers scandal and similar leaks, tax havens are now firmly in the spotlight. Today, roughly half of all global trade still passes through tax haven jurisdictions, costing millions in lost revenue to countries around the world. Such practices affect all of us, but are most keenly felt by poorer people in developing countries, where unfair tax practices have become a major obstacle to development, and which have allowed multinational corporations to continue to exploit developing economies. This collection argues that, for developing countries to achieve social justice and lasting prosperity, they must take control of their own tax destinies, and that this will also be crucial to achieving the Sustainable Development Goals. Covering such topics as natural resource management, representation in global tax institutions and effective strategies for building and protecting tax bases, the collection brings together expertise from a variety of countries and disciplines. It explores the options available to developing countries, and provides a basis for concerted action by tax authorities, policy makers, academics and civil society experts to design tax systems that can sustain a just society.

The phenomena of increasingly global business enterprises with valuable intangible property

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resource for company executives and their advisors who are seeking to better understand this important area of tax law that has become such an important economic facet of so many businesses.

Improve corporate profits through alternative transfer pricing strategies Transfer Pricing: Alternative Practical Strategies presents a case study based upon a fictional company to showcase the preparation of a transfer pricing study that meets regulatory needs. This case study focuses on three alternative strategies to transfer pricing: advance pricing agreements, cost sharing agreements, and the use of joint ventures. The advance pricing section considers the factors to take into account when deciding whether this is the right approach, and details the elements that impact the steps you take at each stage of the APA process, such as the prefiling conference, application submission, and more. The section on cost sharing arrangements presents methods for developing and documenting a qualified cost sharing arrangement, as well as buy-in and buy-out payments, international acceptance of cost sharing arrangements, and more. Finally, the international joint ventures section analyzes, among other things, key tax planning issues, such as sham treatment, taxation of operating income, etc. Transfer pricing is the process of pricing goods or services that are being sold within an entity—either between company divisions or departments or between a parent company and a subsidiary. The right transfer pricing model can prove profitable for your organization. Explore which alternative methods—advance pricing agreements, cost sharing agreements, or joint ventures—are best for your business Access information that guides you in improving corporate profits through targeted transfer pricing methodology Consider new ideas in context through a case study that applies presented concepts to a fictional company Leverage an ancillary test

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bank to reinforce key ideas Transfer Pricing: Alternative Practical Strategies gives you an overview of what transfer pricing is, and offers three strategies that you can leverage to improve corporate profits when determining transfer pricing models.

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This book analyzes the disparities both between federal statutes and regulations, and regulations and administrative practices, in two highly controversial areas of corporate tax policy: intra-company transfer pricing and intangible asset valuations. It addresses issues that can mean hundreds of millions of dollars to individual corporations, and a significant fraction of the federal government's revenue base. Tax practitioners and consultants who are understandably frustrated in their efforts to divine the IRS's reasoning in transfer pricing and valuation issues will find the book very useful. It will also find an audience among elected representatives, other public officials, and tax lobbyists in the process of evaluating existing corporate tax policy or formulating alternative tax policies. In addition, the book is a useful reference for academics studying international taxation, public finance, and treaty compliance. A joint production by six international organizations, this manual explores the conceptual and theoretical issues that national statistical offices should consider in the daily compilation of export and import price indices. Intended for use by both ...

GLOBAL TRANSFER PRICING SOLUTIONS: 2004 covers the major transfer pricing regimes around the world with in-depth discussion and analysis of such topics as proactive transfer pricing management of post-merger integrations, e-commerce and

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intellectual property. This report was prepared by members of major law and accounting firms and senior international transfer pricing professionals at the largest multinationals. It covers a wide range of tools and techniques relevant to transfer pricing in Asia, Europe, Latin America, and North America.

This book provides a concise and pragmatic introduction to transfer pricing. Approaching the subject from an economic and business perspective, it familiarizes the reader with the basic concepts without getting sidetracked by tax law. In turn, the book draws on case studies to demonstrate the identification and application of appropriate transfer pricing methods for the most common intercompany transactions. The intuitive step-by-step guidance, together with integrated Excel-based tools, will equip the reader to ensure compliance with the arm's length principle and thus to minimize tax risk. Based on the post-BEPS OECD Guidelines, the book's content is applicable to a global context.

Transfer pricing continues to be one of the most significant areas of heightened controversy in international taxation for multinational enterprises and tax administrations. Due to its far-reaching consequences, tax professionals and individual tax jurisdictions are required to understand the fundamentals of the topic, which is often caught in a maze of literature. Emerging from the joint research conducted by the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law at WU (Vienna University of Economics and Business), the international tax law firm L&P –

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Ludovici Piccone & Partners, and the experiences from the annual advanced transfer pricing courses and conferences, this first edition of the book acts as a manual for understanding transfer pricing principles and their practical application. It provides a balanced approach by first detailing the basics of transfer pricing and second proceeding to specific topics that are highly relevant in today's tax environment. For the purpose of easy understanding, the book is presented in two parts: Part I: General Topics I. Introduction to Transfer Pricing II. Accurate Delineation and Recognition of Actual Transactions: Comparability Analysis III. Transfer Pricing Methods (Part I): Traditional Transaction Methods IV. Transfer Pricing Methods (Part II): Transactional Profit Methods V. Administrative Approaches to Avoiding/Minimizing Transfer Pricing Disputes VI. Administrative Approaches to Resolving Transfer Pricing Disputes VII. Transfer Pricing Documentation: Master File, Country File and Country-by-Country Reporting Part II: Specific Topics VIII. Attribution of Profits to Permanent Establishments IX. Transfer Pricing and Intra-group Services X. Transfer Pricing and Intra-group Financial Transactions XI. Transfer Pricing and Intangibles XII. Transfer Pricing, Supply Chain Management and Business Restructurings XIII. Transfer Pricing and Customs Valuation XIV. Transfer Pricing and EU State Aid In analysing the above topics, the work undertaken by the OECD, UN, EU, World Customs Organization, World Bank, International Monetary Fund and other international organizations is considered. Moreover, the book contains several practical examples, judicial

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precedents and illustrative explanations to complement the understanding. The book will be a catalyst for immense learning of students and young professionals who are at the introductory stage of understanding the nuances of transfer pricing. Further, the book also caters to tax lawyers, in-house tax counsels and academics working in international organizations, the business community and advisory firms as well as government officials interested in understanding transfer pricing.

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