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The most thorough treatment of its subject available, this book introduces and analyses the international tax issues relating to international manufacturing and distribution activities, extending from the tax regime in the country where the manufacturing activities are located, through to regional purchase and sales companies, to the taxation of local country sales companies. The analysis includes the domestic tax laws relating to manufacturing and distribution company profits as well as international tax issues relating to income flows and the payment of dividends. Among the topics and issues analysed in depth are the following: – foreign tax credits; – taxation in the digital economy; – tax incentives; – intellectual property; – group treasury companies; – mergers and acquisitions; – leasing; – derivatives; – controlled foreign corporation provisions; – VAT and customs tariffs; – free trade agreements and customs unions; – transfer pricing; – role of tax treaties; – hedging; – related accounting issues; – deferred tax assets and liabilities; – tax risk management; – supply chain management; – depreciation allowances; and – carry-forward tax losses. The book includes descriptions of 21 country tax systems and ten detailed case studies applying the analysis to specific examples. Detailed up-to-date attention is paid to the OECD Action Plan on Base Erosion and Profit Shifting (BEPS) and other measures against tax avoidance. As a full-scale commentary and analysis of international taxation issues for multinational manufacturing groups – including in-depth consideration of corporate structures, tax treaties, transfer pricing, and current developments – this book is without peer. It will prove of inestimable value to all accountants, lawyers, economists, financial

managers, and government officials working in international trade environments.

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 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 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.

This book is a concise foreign tax reference tool for the practitioner who needs quick answers to basic corporate and individual tax questions.

This consolidated version of the OECD Transfer Pricing Guidelines includes the revised guidance on safe harbours adopted in 2013, as well as the recent amendments made by the Reports on Actions 8-10 and 13 of the BEPS Actions Plan and conforming changes to Chapter IX.

A detailed history and analysis of the actual statutes behind the Internal Revenue Code revealing the surprisingly limited reach of the American income tax.

Developed through 20 years of experience in auditing practice for clients in a broad spectrum of industries and up-to-date through SAS-112, the CPA's Guide to Management Letter Comments provides literally hundreds of management comment examples for numerous situations that are encountered by real firms working with real clients. Beginning with an example of the actual opening paragraph of a management letter, this compendium continues through all critical areas encountered during an audit and ends with suggested closing paragraphs so that even a first-time management letter preparer can produce a high-quality final product like a well-seasoned auditor.

During the last decade, the Latin American and Caribbean region has experienced unprecedented natural resources abundance. This book highlights how transparency can help realize the benefits and reduce negative externalities associated with the extractive industries in the region. A central message is that high-quality and well-managed information is critical to ensure the transparent and effective governance of the sector. The insights from experiences in the region can help policymakers design and implement effective regulatory reforms and adopt international standards that contribute to this goal. This is particularly important at a time when the recent boom experienced by extractives in the region may be coming to an end.

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