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Leo Edward Miller

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Transfer Pricing Developments Around the World 2018 Michael Lang,Alfred Storck,Raffaele Petruzzi,2018-08-21

Intensive work on transfer pricing one of the most relevant and challenging topics in the international tax environment continues to increase worldwide at every level of government and international policy with far reaching impact on countries legislations administrative guidelines and jurisprudence This book presents an in depth issue by issue analysis of the current state of developments along with suggestions for future solutions to the problems raised Emerging from the 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 this book offers seven topic based papers prepared by international experts on transfer pricing Greatly helping to define where the line should be drawn to distinguish genuine transfer pricing issues from other anti avoidance measures this book encompasses the following topics global transfer pricing developments transfer pricing developments in the European Union transfer pricing developments in the United States transfer pricing developments in developing countries and emerging economies recent developments on transfer pricing documentation and country by country reporting recent developments on comparability analysis in transfer pricing and recent developments on the profit split method The intense work of international organizations such as the OECD UN EU World Customs Organization World Bank International Monetary Fund and other international organizations is thoroughly analyzed in this book The detailed analysis will be of immeasurable value to the various players including international organizations the business community and advisory firms corporate CEOs and CFOs and government officials as well as to tax lawyers in house counsel and interested academics in facilitating an efficient dialogue and coordinated approach to transfer pricing in the future

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