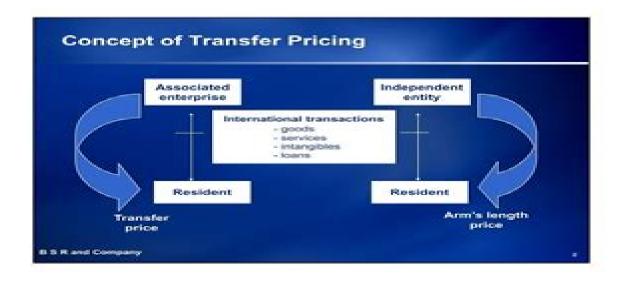
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the DEMPE concept with the arm s length principle full description of each DEMPE function and analysis in the light of possible tax and transfer pricing consequences modes of application of the DEMPE concept which can be directly implemented in practice and additional tools e g value chain analysis or RACI matrix useful in applying the DEMPE concept The book also provides the first in depth analysis of the interplay between the DEMPE concept and the licence model in its various structural variations Taking into account that intangibles amount to 84% of the market value of the S P 500 companies and that over 80% of global trade transactions can be linked to value chains of multinational enterprises and recognizing the scarcity of guidance heretofore on the application of the DEMPE concept tax advisors corporate counsels tax authorities and academics around the world are sure to appreciate and benefit greatly from this matchless and practical book

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Transfer Pricing Theory & Practice Hari Om Jindal, Surya Jindal, 2020 Tax Management Transfer Pricing Report, 2002 Transfer Pricing and Intangibles Michael Lang, Alfred Storck, Raffaele Petruzzi, Robert Risse, 2019-04-11 Transfer pricing treatment of intangibles Issues und developments In recent decades intangibles have become one of the most relevant success factors for Multinational Enterprises MNEs Along with the increasing importance of intangibles for economies their tax treatment has also been under scrutiny which includes inter alia respective transfer pricing issues MNEs are seeking for the best ways to optimize their business arrangements with the related intangibles while at the same time getting the most tax efficient treatment On the other hand tax authorities have become increasingly concerned with the ease

that intangibles can be used in aggressive planning These concerns have been noticed and addressed by the Organization for Economic Cooperation and Development which presented its main findings with respect to transfer pricing aspects of intangibles in Action 8 of the BEPS Project in 2015 and in the 2017 OECD Transfer Pricing Guidelines This book is based on the outcomes of the presentations and discussions held during the WU Transfer Pricing Symposium Transfer Pricing and Intangibles Current Developments Relevant Issues and Possible Solutions that took place in October 2018 at the WU Vienna University of Economics and Business The publication discusses the most important issues and recent developments related to transfer pricing treatment of intangibles Starting with the definition of intangibles it further deals with topics such as appropriate attribution of intangible related profits structuring of intangibles in MNEs and proper valuation of intangibles The authors apart from providing a theoretical background to the discussed issues also present case studies that show how certain issues can be approached in practice Every chapter ends with a summary of the discussions held during the panels of the Transfer Pricing Symposium in which representatives of tax administrations multinationals and tax advisories presented their opinions on the issues at stake Transfer Pricing Developments Around the World 2017 Michael Lang, Alfred Storck, Raffaele Petruzzi, 2016-04-24 Derived from the renowned multi volume International Encyclopaedia of Laws this 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 Advanced Seminar on Trademark Law ,2000 security systems Tax Notes International ,2007 Tax **Management Portfolios**, 2006 Legal Aspects of International Sourcing, 2010 The Journal of International Taxation ,1998 ADBI Executive Summary Series ,2000 IRS Practice & Policy ,1990 International Cooperation in Tax Matters United Nations. Ad Hoc Group of Experts on International Co-operation in Tax Matters, 2005 This report contains guidelines for international tax practitioners dealing with the negotiation of double taxation treaties as well as those involved in the actual implementation of those treaties. The report deals with the issues from the point of view of taxpayers who would like to experience tax equity non discriminatory taxation non over assessment and non double taxation International Co-operation in Tax Matters United Nations. Ad Hoc Group of Experts on International Co-operation in Tax Matters, 2005 The Federal Lawyer ,2000 <u>Transactions</u> Patrick Way, 1994 Each book in the Transactions Series takes the key

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