

Fund Transfer Pricing Ernst Young

Advance Pricing Agreements Tax Management Transfer Pricing Report International Taxation of Permanent Establishments International Transfer Pricing 1994 Taxation in Ghana: a Fiscal Policy Tool for Development Export and Import Price Index Manual: Theory and Practice Handbook of Management Accounting Research Fairness in International Trade International Taxation of Manufacturing and Distribution Accounting & Business Corporate Finance The Journal of International Taxation Tax Director's Guide to Transfer Pricing in Asia and Australia Tax Notes International Financial Executive The transnational lawyer Finance Week Company Taxation in the Internal Market Annual Survey of International & Comparative Law Report of Proceedings of the Tax Conference Convened by the Canadian Tax Foundation Michelle Markham Michael Kobetsky Dr. George Appiah-Sokye OECD Christopher S. Chapman Geoff Moore John Abrahamson Kenneth R. L. Parker European Commission Canadian Tax Foundation

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Tax Foundation

transfer pricing the pricing of cross border intra firm transactions between related parties is now the top international tax issue faced by multinational enterprises in an international taxation environment characterized by rigorous enforcement of transfer pricing documentation disclosure and audit processes a need has arisen for multinationals to be cognizant of the impact of their tax risk appetite on their relationship with taxation authorities and to be aware of how best to manage their transfer pricing arrangements the most promising development has been the growing commitment to advance pricing agreements apas arrangements made prospectively between a multinational taxpayer and one or more revenue authorities agreeing on an appropriate set of criteria for the determination of the transfer pricing of the covered transactions over a period of time this is the first book to offer expert insights on apas from a practical perspective by focusing on the united states and australia the two countries that were at the forefront of adopting apas and whose wealth of experience over two decades confirms their apa programs as the global paradigms the author is able to highlight the advantages and disadvantages of pursuing an apa and to shed light on the powerful efficacy of this strategy for avoiding transfer pricing disputes in addition the author enlists the views of revenue authorities transfer pricing practitioners and corporate counsel who deal with the realities of transfer pricing assessment and compliance on an ongoing basis offering acute insight into how apas really work in a practical way this book contributes to the body of knowledge on apas in the context of transfer pricing by providing in depth scrutiny of the most important issues surrounding this critical area and by examining innovations in apas in the united states and in australia its unmatched coverage will be welcomed by tax experts at law firms and multinational companies as well as by revenue officials policymakers and scholars and researchers in international taxation

the effects of the growth of multinational enterprises and globalization in the past fifty years have been profound and many multinational enterprises such as international banks now operate around the world through branches known as permanent establishments the business profits article article 7 of the oecd model tax treaty attributes a multinational enterprise s business

profits to a permanent establishment in a host country for tax purposes michael kobetsky analyses the principles for allocating the profits of multinational enterprises to permanent establishments under this article explains the shortcomings of the current arm's length principle for attributing business profits to permanent establishments and considers the alternative method of formulary apportionment for allocating business profits

this report has been produced jointly by bi and ernst and young based on a worldwide survey of mncs interviews with leading corporate planners together with contributions from tax and accounting experts

the first edition of this book taxation in ghana a fiscal policy tool for development is the product of considerable tax research from 1943 to 2018 spanning a period of 75 years and grounded in knowledge and concepts as well as applications through an extended period of tax practice teaching and learning combined with international exposure a lot of insights have been illuminated based on lessons learned and drawn from other countries including the united states of america to enrich the contents against the backdrop of the dynamic nature of taxation and fiscal policy most of the existing taxation books in ghana focused on tax practice so the purpose of this book is to bridge the taxation scholarship gap in addition to traditionally treated topics in most taxation books in ghana the novelty in this book is the inclusion of important topics on tax planning tax reforms and tax administration and many more as a result specific recommendations have been proffered for the consideration of policy makers in developing countries references and acts of parliament supported by appendices have been provided for further studies on the subject a true story of the first major oil discovery in ghana by mr george yaw owusu with m rutledge mccall published 2017 in the united states of america in pursuit of jubilee was used to enrich the discussion on petroleum oil and gas in chapter 48 of this textbook additionally apostle professor opoku onyinah of the church of pentecost has been presented for his phenomenal transformational leadership in africa in chapter 66 the book has been designed for 1 individual study 2 group study 3 lecture material 4 policy manual and 5 library or reference

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

volume two of the handbooks of management accounting research consists of two groups of chapters the first draw together research that has focussed on particular management accounting practices the second set synthesise contributions to the literature that have been focussed within particular organisational contexts volume two concludes with a review of research on how management accounting practice and research varies around the world special pricing available if purchased as a set with volume 1 documents the scholarly management accounting literature publishing both in print and online through science direct international in scope

this book arises out of papers delivered at the world congress of the international society of business economics and ethics isbee held in cape town in 2008 there are two sections first a number of key papers provide an insight into global business wealth creation and welfare issues with particular reference to the african continent appropriate for a congress that was based in south africa and drew wide participation from african scholars second it provides the output from a global research project on fairness in international trade which ran over the two years prior to the congress this project drew together the work of scholars in five regions across the globe and is the first time that such a global perspective has been attempted this book is aimed at academics working in the area of international trade or development economics particularly those who have an interest in the ethical dimensions of trade it will also be of interest to students of development economics and business ethics particularly at masters and doctoral level

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

a dozen leading transfer pricing professionals from baker mckenzie deloitte ernst young kpmg and pricewaterhousecoopers offer their advice and insights on how to navigate complex issues in australia china hong kong india japan and singapore topics discussed include application of safe harbor provisions in australia understanding japan s new documentation requirements strategies to minimize transfer pricing risk in india implications of recent court decisions in hong kong valuing intra group services in singapore and how to apply the best method rule in china the book includes english translations of china and japan s implementing regulations and overview of the transfer pricing analysis process and a glossary of transfer pricing terminology

analysis of problems in the field of company taxation in the internal market the obstacles to cross border economic activity and their possible remedies this study the major source document for the european commission s policy statement on company taxation com 2001 582 also considers the possibilities for a reform of company taxation at eu level which would aim at providing companies with a single consolidated tax base for their eu wide activities

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