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valuing and transferring intangibles make this an issue requiring a creative review of existing transfer pricing methodologies and techniques In this ground breaking new study Michelle Markham offers an in depth examination of attitudes at the forefront of this rapidly evolving area of taxation law focusing her work on a comparative analysis of the US OECD and Australian perspectives on the transfer pricing of intangible assets The Transfer Pricing of Intangibles not only highlights the current problems encountered in inter affiliate transactions of intangible property but also attempts to offer a variety of solutions to these problems Among the issues explored are the following how the tax treatment of intangible in the context of transfer pricing has become a major international tax concern definitional issues which are vital to an understanding of transfer pricing application of the arm s length principle to intangible asset transactions determination of legal and economic ownership of group intangible assets intangible asset valuation and transfer transfer pricing methodologies global formulary apportionment transfer pricing documentation requirements penalties for non compliance resolution of transfer pricing disputes and advance pricing agreements Revenue authorities multinational enterprise executives and tax practitioners around the world will greatly appreciate the recommendations and solutions proposed in this knowledgeable and thoughtful book Its acute sense of the opportunities and pitfalls of an ever more complex area of economic activity place it in a category of its own of inestimable benefit to interested parties Gale Directory of Databases ,2003 Multinational Human Resource Management and the Law Matthew W. Finkin,Joel Cutcher-Gershenfeld,Takashi Araki,Roberto Fragale Filho,Andrew Stewart,Bernd Waas,2013-09-30 Multinational corporations face considerable complexity in setting the terms and conditions of employment Differing national laws prevent firms from developing consistent sets of employment policies but at the same time employees are often expected Real Estate Record and Builders' Guide ,1895 Code of Federal Regulations ,2006 Special edition of the Federal register containing a codification of documents of general applicability and future effect as of April 1 with ancillaries *Government Contract Law* ,2007

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