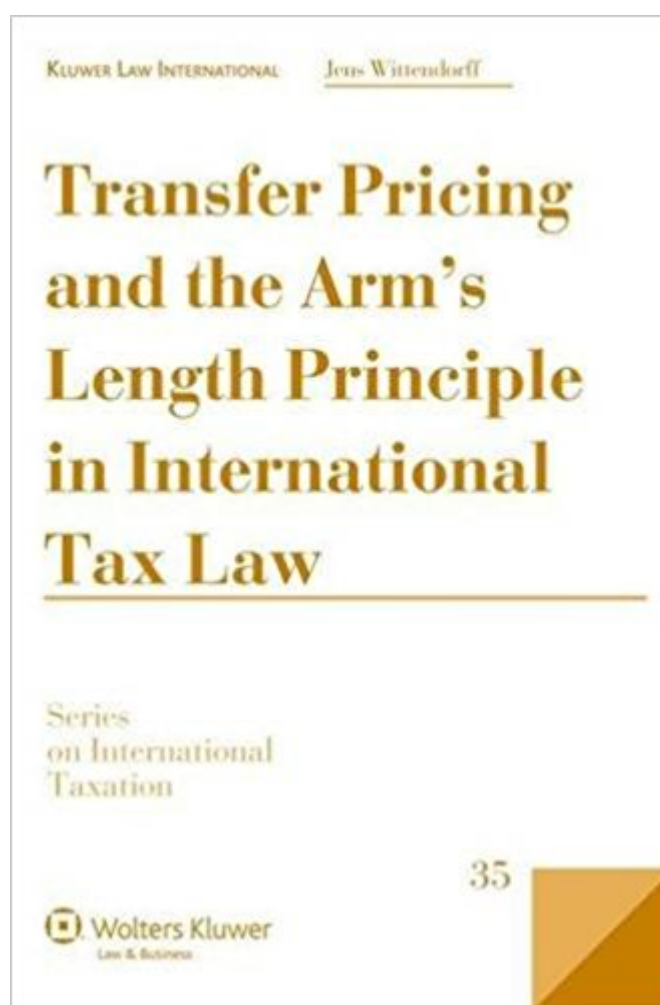


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Transfer Pricing Arms Length Principle International Tax Law (Series On International Taxation) (Series In International Taxation)



Synopsis

Transfer Pricing Arms Length Principle International Tax Law analyzes the legal basis for the arm's length principle and the contents of the principle in U.S. tax law as well as the OECD Model Tax Convention and Transfer Pricing Guidelines. It includes a thorough review of international case law on transfer pricing from the US., Canada, Australia, United Kingdom, Germany, France, the Netherlands, Denmark, Sweden and Norway. The book consists of the following chapters: Part One - Introduction Part Two, The Legal Basis for the Arm's Length Principle U.S. Tax Law OECD Other International Law Part Three, The Concept of the Arm's Length Principle General U.S. Tax Law German Tax Law Article 9(1) of the OECD Model Part Four, General Arm's Length Rules Recognition of the Controlled Transaction Combined and Separate Arm's Length Test Set-Offs Multiple Year Analysis Comparability Requirement Foreign Legal Restrictions Arm's Length Range Part Five, Special Arm's Length Rules Services Cost Sharing Intangibles Part Six, Transfer Pricing Methods General Transfer Pricing Methods Part Seven, Conclusion

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