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ratings and impact of implicit support loans cash pooling financial guarantees transfer pricing aspects of performance guarantees mezzanine financing considerations for crypto financing impact of crises situations such as COVID 19 how treasury operations can be structured in a group and the decision making process involved how hedges offset or mitigate risks how to apply the arm's length principle to factoring and captive insurance transactions comparability analysis for various transactions special considerations for transactions carried out by a permanent establishment EU state aid and its interaction with transfer pricing rules dispute prevention and resolution tools under the OECD UN and EU frameworks and developing countries perspectives focusing on Brazil India and South Africa Given the challenges facing taxpayers and tax authorities alike this book will prove an immeasurably valuable reference guide to support tax practitioners tax administrations and tax scholars in developing standards and policies in dealing with intra group financing issues

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Wink, 2021-12-01 Brazil Land of the Past scrutinizes the ideological roots of the so called New Right in Brazil The book traces the continuity and resilience of a system of thought based on the idea of a God given hierarchical order to be defended against any social contract and modernizing relativization It explains in detail how today a diverse movement which includes actors ranging from the authoritarian Bolsonaro wing to economic liberals to the military to both Catholic and evangelical religious conservatives assumes unanimously the ideas of this tradition as underlying premises of their political action Though not always explicitly this drives the self declared liberal conservative but rather anti modernist reaction which claims to liberate an imaginary authentic Brazil from an aberrant State and in so doing intends to preserve inherited privilege in an

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