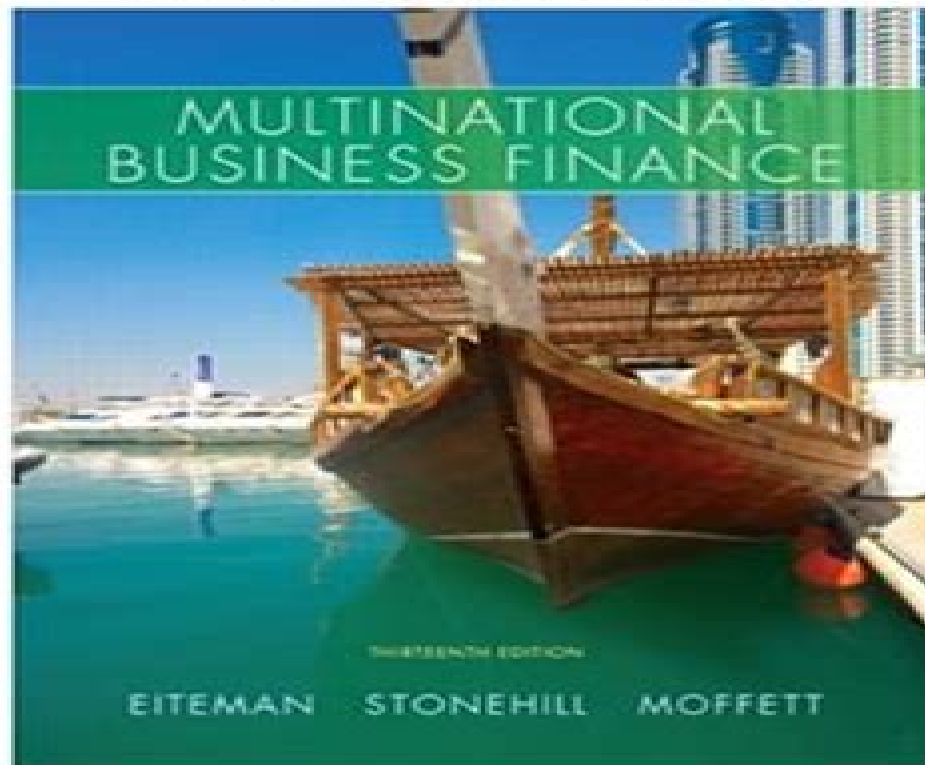


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present the subject in relation to a business world to which readers can easily relate      **Australian National**  
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multinational enterprises and thus also the fiscal revenues of the countries where they are doing business The importance of  
transfer pricing has significantly expanded over time and culminated with the work of the OECD on Base Erosion and Profit  
Shifting BEPS With the globalisation of business activities the need for States to prevent tax avoidance and the risk of double  
taxation faced by multinational enterprises transfer pricing has become a key question for multinational enterprises and tax  
administrations alike Introduction to Transfer Pricing intends at providing a general introduction to the fundamentals of  
transfer pricing The book is focused on explanations of the principles that apply albeit to various extents in most countries  
Although the majority of these principles are provided by the OECD the views of other international organisations in  
particular the United Nations and the European Union are also taken into account Moreover the book illustrates the  
fundamentals of transfer pricing with concrete examples based on the structures often used by multinational enterprises  
when conducting cross border business activities Also included are relevant court cases from a variety of countries Among  
the issues and topics covered are the following the arm s length principle in theory and practice transfer pricing methods  
intercompany transactions involving intangibles and financial transactions common types of transfer pricing models cross  
border business restructurings the substance requirement for transfer pricing purposes attribution of profits to permanent  
establishments and the prevention and resolution of transfer pricing disputes This second edition was updated based on the  
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sections on economics society and politics were written by some of the world s leading China experts in Europe and give a  
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