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Marcel A. Müller

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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 Guide to International Transfer Pricing Dr A. Michael Heimert, T.J. Michaelson, 2018-10-26 The pricing of goods services intangible property and financial instruments within a multi divisional organization particularly in regard to cross border transactions has emerged as one of the most contentious areas of international tax law This is due in no small measure to the rise of transfer pricing regulations as governments seek to stem the flow of their tax revenue from their jurisdictions This thoroughly practical work provides guidance on an array of critical transfer pricing issues The guide s relevance is further enhanced by the inclusion of country chapters covering domestic transfer pricing issues in a variety of key national jurisdictions The Master Guide to Controllers' Best Practices Elaine Stattler, Joyce Anne Grabel, 2020-06-10 The essential guide for today s savvy controllers Today s controllers are in leadership roles that put them in the unique position to see across all aspects of the operations they support The Master Guide to Controllers Best Practices Second Edition has been revised and updated to provide controllers with the information they need to successfully monitor their organizations internal control environments and offer direction and consultation on internal control issues In addition the authors include guidance to help controllers carryout their responsibilities to ensure that all financial accounts are reviewed for reasonableness and are reconciled to supporting transactions as well as performing asset verification Comprehensive in scope the book contains the best practices for controllers and Reveals how to set the right tone within an organization and foster an ethical climate Includes information on risk management internal controls and fraud prevention Highlights the IT security controls with the key components of successful governance Examines the crucial role of the controller in corporate

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