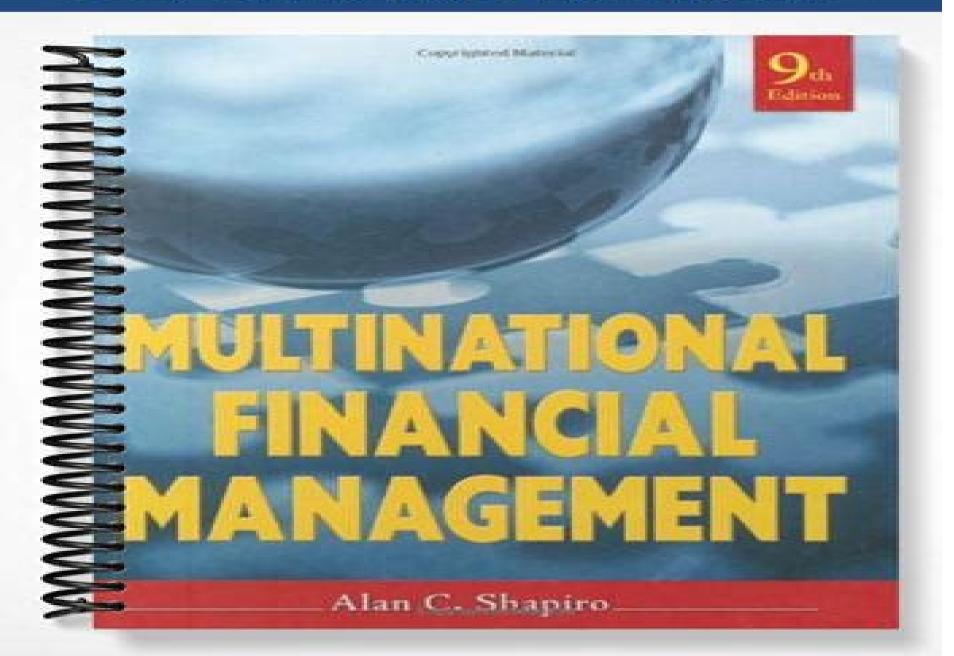
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The Transfer Pricing of Intangibles Michelle Markham,2005-01-01 Transactions involving intellectual property play an increasingly significant role in economic activity at every level from global to local with particular challenges for taxation and revenue authorities Moreover the manifold complexities associated with identifying 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

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been under extreme pressure in the wake of the financial crisis Multinational firms are weighing the costs and benefits of international scale and scope and are increasingly under pressure to hire local to source local and to pay taxes domestically At the same time global competitive pressures have intensified This book reviews international business practices from the multinational firm perspective and provides pathways forward concerning competitiveness and sustainability in global markets What sets this book apart from others is that the benefits and pitfalls of globalization are addressed Chapter coverage focuses on the functional areas of the business and how they are impacted by international expansion Practical case studies supplement chapter coverage and highlight both positive and negative developments in the global business arena Readers should expect to be challenged on what will be the limits of the multinational firm in the future and how multinational firms can continue to prosper while at the same time adhere to sustainable business initiatives Equally useful to both undergraduate and graduate students of international business as well as professional development programs Global Business Competitiveness and Sustainability provides a necessary tonic for dealing with today s troubled seas of globalization

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