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Fundamentals of Transfer Pricing Michael Lang, Giammarco Cottani, Raffaele Petruzzi, 2025-05-19 Fundamentals of Transfer Pricing Volume 1 Principles and Practice Edited by Raffaele Petruzzi Giammarco Cottani accurate delineation and recognition of actual transactions transfer pricing methods comparability analysis transfer pricing audits and litigation administrative approaches to preventing and resolving transfer pricing disputes transfer pricing documentation attribution of profits to permanent establishments transfer pricing and specific transactions use of new technologies in transfer pricing and interplay between transfer pricing and other rules This book delves into both foundational concepts and emerging trends in transfer pricing providing readers with the tools to understand its dynamic application in real world scenarios By analysing examples case studies and the implications of recent judicial precedents it bridges the gap between fundamental principles and practical implementations The application of transfer pricing legislation remains one of the most challenging tasks for taxpayers and tax authorities around the world With this comprehensive source of practical guidance tax lawyers in house tax counsels government officials academics advisory firms and the business community worldwide will have all the support they need to move forward in tackling this complex aspect of the current tax environment Montenegro Annalisa Rellie, Rudolf Abraham, 2015-01-05 Across the Adriatic from Italy Montenegro occupies one of Europe s hidden corners With medieval gems and a stark rugged beauty the country offers something for cultural and active travellers alike This fifth edition of Bradt s Montenegro is the most up to date and detailed guide to the country available It contains the

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