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advance pricing agreements or arrangements apas are designed as a dispute prevention mechanism for transfer pricing related issues and provide certainty to taxpayers on taxation of cross border transactions since the apa procedure was introduced by tax authorities in the late 1980s it has gradually taken hold worldwide and evolved along several dimensions with important characteristics this book the first exclusively dedicated to the global apa regime provides a comprehensive in depth discussion of the apa concepts and procedures in twenty five jurisdictions across

europe asia asia pacific north america south america and africa noting the particular genesis features and progress made under each programme the analysis covers such elements as the following the types of apas and their characteristics the main steps involved in an apa process key advantages of apa programme and comparative study of the apa as a preferred dispute prevention mechanism over other dispute resolution mechanisms key issues observed and in practice by various apa authorities worldwide inter alia involving cost base of captive entities resolution of transfer pricing issues involving intangibles location savings joint site visits attribution of profits to pes apas for small businesses abbreviated procedure for renewal of apas significance of economic nexus prior to the grant of apas and other relevant issues exchange of apa rulings equip tax authorities to quickly identify risk areas so as to curb base erosion and profits shifting beps which augurs well for the apa programme and is another milestone in its evolution process apas provide jurisdictions with an excellent platform to fostering a non adversarial tax regime the author includes an extended case study of india s apa programme highlighting some of its conspicuous elements with equal focus on certain special characteristics of apas in australia canada france germany ireland korea the netherlands poland uk and the united states factors influencing speedier processing and suggestions on further improvement of apa programmes are also included numerous tables and figures illustrate all aspects associated with apas with more economies opening up and the worldwide implementation of the oecd g20 beps action reports in an endeavour to combat beps access and recourse to apas is sure to grow this invaluable book will enable tax administrations to learn from each other s experiences and help to prevent costly and time consuming transfer pricing audits and litigation for multinational enterprises the book will be welcomed by revenue officials professionals and advisors concerned with international taxation as well as by tax law academics

glittering mountains enchanted forests celestial love stories explore the universe of kalidasa ancient india s most celebrated poet under the wish fulfilling tree invites you into shimmering landscapes where gods kings and lovers come alive through the masterful imagination of kalidasa the vivid summaries of all seven of his known works from the timeless romance of abhijnanashakuntalam to the cosmic passion of meghadutam and the majestic rhythms of raghuvamsham are perfect for young adults and curious readers everywhere kalidasa s poetry and plays rank among the great literary compositions of all time this lively volume captures in english the power and richness of kalidasa s sanskrit originals his unforgettable storytelling spirited characters and luminescent verse whether you are encountering kalidasa for the first time or rediscovering his magic this book is an essential companion to one of literature s brightest

stars

this book presents the select proceedings of the international conference on sustainable infrastructure development innovations and advances sidia 2020 the book addresses the issues of optimal resource allocation and utilization construction cost minimization budget optimization for infrastructure development in hilly terrain as well as plains to ensure quality and safety with minimal environmental impact the topics covered include planning design and construction of sustainable infrastructure projects policy and practices to be considered for the comprehensive development which is socially inclusive specifically in developing nations transportation engineering and management which is performance based and emerging economical models for partnerships environment engineering and management for ascertaining the best methods for environmental impacts assessment to capture the true indirect costs of a infrastructure project geotechnical and water resource engineering using new developments and utilizing the various technological impacts for ensuring disaster preparedness of any region this book can prove to be useful for beginners researchers and professionals interested in the latest advances and innovations in sustainable infrastructure development

smiths complete guide presents proven healing techniques from 5 000 years ago to the most modern innovations with more than 300 listings in 135 categories it is one of the most complete books ever published on complementary and alternative therapies

offering a comparative case study of transitional justice processes in afghanistan and nepal this book critically evaluates the way the local is consulted in post conflict efforts toward peace and reconciliation it argues that there is a tendency in transitional justice efforts to contain the discussion of the local within religious and cultural parameters thus engaging only with a static local as interpreted by certain local stakeholders based on data collected through interviews and participant observation carried out in the civil societies of the respective countries this book brings attention to a dynamic local where societal norms evolve and realities on the ground are shaped by shifting power dynamics local hierarchies and inequalities between actors it suggests that the local must be understood as an inter subjective concept the meaning of which is not only an evolving and moving target but also dependent on who is consulted to interpret it to external actors this timely book engages with the divergent range of civil society voices and offers ways to move

forward by including their concerns in the efforts to help impoverished war torn societies transition from a state of war to the conditions of peace

history geography religion and culture have bound nepal and india into an extraordinary relationship while many nepalis actively participated in india s independence movement new delhi too has played an important role in the political evolution of its landlocked northern neighbour these elements of affinity exacerbated by asymmetries in area and population are however responsible for the rancour underlying the uneven relationship many indians like most nepalis are also exasperated by the resentment this proximity has produced preconceived notions and outright prejudices have tightened this embrace of estrangement new delhi s big brother act has been stifling for many nepalis this was more pronounced when nepal got painted red with the incessant battering of the maoist rebels and was split between monarchy and republicanism this book takes an unconventional approach to india nepal relations devoid of the abstractions of the academic tomes that fill up bookshelves this volume also steers clear of the detachment of a historical account the book draws from a plethora of documents in the public record though it also relies on the author s personal experience the provocative title encapsulates the crisp message how independent india has virtually adopted british colonial policies towards nepal by elucidating the misgivings and follies that have long constrained the relationship the book sets out to explore the inherent possibilities

maura o neill explores what happens when women of different faiths and varying positions on an ideological spectrum enter into both inter and intra religious dialogue on issues of concern to us all

obwohl wilhelm von humboldt bereits zu lebzeiten in pariser gelehrtenkreisen rezipiert wurde und seine schriften in frankreich seit einigen jahrzehnten verstärkt übersetzt und kommentiert wer den fehlen bisher umfassende studien zur

französischen rezeption seines werks diese forschungslücke schließt die vorliegende arbeit nach einem gesamtüberblick wird in drei genaueren fallstudien der inhaltliche schwerpunkt der französischen rezeption herausgearbeitet im unterschied zu deutschland wird humboldt bis heute in frankreich kaum als diplomat und bildungspolitiker sondern vor allem als sprachwissenschaftler und sprachphilosoph wahrgenommen die gründe für diesen spezifisch französischen blick auf humboldts werk werden in analysen zu den involvierten rezipientenkreisen institutionen und themenkonjunkturen offengelegt methodisch situiert sich die arbeit im kontext der historiographie der linguistik und der kulturtransfer forschung neben einer systematischen rezeptions biblio graphie mit über 200 titeln enthält die untersuchung zudem die erstedition des briefwechsels zwischen humboldt und den französischen philologen jean louis und eugène burnouf

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