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Ichiro Sugimoto



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generally accepted OECD arm's length principle Comparing the tax measures implemented in the corporate tax law systems of forty countries this study investigates such aspects of intra group financing as the following corporate finance theories studies and surveys regarding financing decisions application of the arm's length principle to limit the deductibility of interest expenses impact of the OECD's Base Erosion and Profit Shifting BEPS project transfer pricing issues related to intra group financing credit risk in corporate finance rationales utilized by credit rating agencies and the assessment of arm's length nature of intra group financing The author describes ways in which the application of the arm's length principle can be strengthened and how the related risk of distortion and manipulation can be minimized The solutions and methodologies proposed are applicable to any business sector Given that determination of the arm's length nature of transactions between related companies is one of the most difficult tasks currently faced by taxpayers and tax administrations around the world this thorough assessment and analysis will prove extraordinarily useful for in house and advisory practitioners corporate officers academics international organizations and government officials charged with finding effective responses to the serious issues raised In addition to its well researched analysis the book's comparative overview of how loans financial guarantees and cash pooling are currently addressed by OECD Member States and by their national courts is of great practical value in business decision making

The Palgrave Handbook of Economic Performance Analysis Thijs ten Raa, William H. Greene, 2019-12-13 This Handbook takes an econometric approach to the foundations of economic performance analysis The focus is on the measurement of efficiency productivity growth and performance These concepts are commonly measured residually and difficult to quantify in practice In real life applications efficiency and productivity estimates are often quite sensitive to the models used in the performance assessment and the methodological approaches adopted by the analysis The Palgrave Handbook of Performance Analysis discusses the two basic techniques of performance measurement deterministic benchmarking and stochastic benchmarking in detail and addresses the statistical techniques that connect them All chapters include applications and explore topics ranging from the output input ratio to productivity indexes and national statistics

Research Handbook on Housing, the Home and Society Keith Jacobs, Kathleen Flanagan, Jacqueline De Vries, Emma MacDonald, 2024-08-06 This dynamic Research Handbook explores key perspectives topics and methodologies used to understand housing the home and society Pairing social theory with a broad range of case studies from the Global North and South it offers a unique insight into the field

The Publishers' Circular and Booksellers' Record, 1918 *Macroeconomics* Campbell R. McConnell, Stanley L. Brue, 1993 McConnell and Brue's *Macroeconomics Principles Problems and Policies* is the leading Principles of Macroeconomics textbook because it is innovative and teaches students in a clear unbiased way The 17th Edition builds upon the tradition of leadership by sticking to 3 main goals help the beginning student master the principles essential for understanding the economizing problem specific economic issues and the policy alternatives help the student understand and apply the economic perspective and reason accurately and

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economics *British Books* ,1918 **Contingent Valuation of Nonmarket Benefits in Project Economic Analysis**
Asian Development Bank,2021-12-01 Investment projects are increasingly designed to provide multiple benefits Some of these benefits are easily quantified through market valuation methods while others are measured for their nonmarket values The contingent valuation method CVM is one of the most widely used techniques to quantify and value benefits from nonmarket goods and services such as improvement in air and water quality and protection of ecosystems This reference book provides a comprehensive guide to CVM It aims to help improve future CVM studies and estimation of willingness to pay to inform economic analysis at the Asian Development Bank and beyond

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