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value creation and its effects on transfer pricing and tax law emerging from the oecd g20 beps project a new somewhat fuzzy notion of value creation came to permeate not only transfer pricing language but also wider allocation rules and anti abuse provisions in international tax law the notion of value creation reframes the interpretation and application of the arm s length principle alp that is embedded in articles 7 and 9 of the oecd model convention this new value creation notion and approach assist in understanding key enterprise functions while different industry sectors manifest these concepts in various ways situating such notions and this approach within the law of tax treaties and analyzing terms of the oecd transfer pricing guidelines alongside their factual context is the aim of this book here law students address transfer pricing and value creation in sectors as varied as commodities trade automotive consumer products food and beverages pharmaceutical and life sciences telecommunications and the key topic of value creation in a digitalized economy our ll m students were required to address issues not explored in legal research and to discuss factual topics relevant for transfer pricing all students focused on topics that are new to the international tax debate that keep evolving and on factual matters that often escape legal research

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