

Interesse E A Regra O Ensaio Sobre O Multilateralismo

ABUSO DE TRATADOS INTERNACIONAIS E A REGRA DO PRINCIPAL PURPOSE TEST
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o livro estuda a regra do principal purpose test ppt uma regra geral antiabuso que lida com planejamentos tributários internacionais essa regra foi proposta no âmbito do projeto beps base erosion and profit shifting como fruto da ação 6 do projeto após uma introdução sobre os planejamentos tributários internacionais e de regras propostas ao longo dos anos para lidar com essa prática estuda se a regra ppt avalia se o conceito os objetivos o alcance e os elementos estruturantes da regra ppt bem como o status atual de adoção dessa regra nos tratados internacionais celebrados pelo brasil

of two works written on brecht in brazil p 89

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