

Limiting Base Erosion

Pinetz/Schaffer (Eds.)
Series on International Tax Law
Volume 104
2017, 568 pages, pb., Engl.
Subscription Price EUR 99,20
Regular Price EUR 124,-

THE EDITORS

Dr. Erik Pinetz LL.M., MSc.,

International Tax Services Department of EY Austria and lecturer at the Institute of Austrian and International Tax Law

Dr. Erich Schaffer MSc. LL.B.,

Business Tax Advisory Department of EY Austria and lecturer at the Institute of Austrian and International Tax Law



Limiting base erosion from different viewpoints

Hybrid mismatch arrangements, CFC rules, transfer pricing rules: "Limiting Base Erosion" provides a comprehensive analysis in the literature of all the issues related to base erosion. It proves to be of the utmost importance in order to provide practical guidance to the OECD Member countries during the process of implementation and deals especially with four key areas of interest:

- Limiting base erosion by neutralizing the effects of hybrid mismatch arrangements
- ➤ Limiting base erosion by strengthening CFC rules
- ➤ Measures against base erosion via interest deductions and other financial payments
- ➤ Limiting base erosion by improving transfer pricing rules.

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ISBN 978-3-7073-3758-7

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