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 bloc Brazil Russia India China and South Africa and with all of them at the same time listed among the top seven countries
 plagued by tax evasion and avoidance in the guise of illicit out flows the ve governments both individually and through
 cooperative initiatives have devised new international tax strategies that are proving to be of great interest and value to
 other countries both developing and developed The core of these strategies addresses the necessity of stemming the out flow
 of revenue while strongly supporting FDI both inbound and outbound while complying with international obligations
 including those arising from human rights laws This book is the rst in depth commentary on this new and evolving area of
 international tax law The detailed analysis covers the entire eld of BRICS international tax law considering topics such as the
 following information exchange procedures and pitfalls response to the OECD s Base Erosion and Profit Sharing BEPS
 initiative role of bilateral and multilateral double taxation conventions including the Multilateral Instrument and the Bilateral
 Investment Treaties thin capitalization transfer pricing controlled foreign corporation rules shortcomings related to
 authorities limited manpower international audit and investigation procedures the BRICS approach to residence and
 mandatory and binding arbitration and the BRICS approach to shaping the developing world s international tax system
 Notably the author personally conducted interviews with senior international representatives of the BRICS tax authorities as
 well as with leading BRICS academics and practitioners Tax cases together with human rights and investment cases and
 administrative guidelines in all ve countries are also included in the analysis The study concludes with recommendations for
 improving each of the ve countries tax law and procedures especially in the area of dispute resolution The author s goal is to
 extend the existing body of knowledge of the BRICS international tax laws in order to assist in developing an understanding
 of the BRICS approach to dealing with evasion and avoidance an approach which facilitates both outbound and inbound FDI
 simplifies tax authority administration and establishes a basis for resolving international disputes which is compatible with
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