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# Treaty Interpretation In Investment Arbitration

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**energy charter secretariat - ena** - 3 foreword the energy charter treaty is a unique instrument for the promotion of international cooperation in the energy sector. following its entry into force on 16 april 1998, the **the 50th anniversary of the oecd model tax convention** - wcr 1 1 the 50th anniversary of the oecd model tax convention mary bennett is head of tax treaty & transfer pricing division, oecd centre for tax policy & administration1 introduction **robert kirkness - curriculum vitae** - • uncitral arbitration under joint venture agreement . representing a chinese state-owned entity in an international commercial arbitration brought against it by a canadian-listed oil and gas company **february 17, 2016 - united states department of the treasury** - february 17, 2016 3 preferential treatment to interest, royalties, or guarantee fees as compared to income from sales of goods or services. such preferential treatment must be in the form of either a **general effective date under article 28: 1 december 1983** - double taxation taxes on income convention between the united states of america and australia convention signed at sydney august 6, 1982; transmitted by the president of the united states of america to the senate september 14, 1982 **tax issues in international franchising** - the concept of a “pe” is peculiarly a tax treaty concept, one embodied in the varying definitions of what constitutes a “pe” with respect a particular **united states model income tax convention - front page** - united states model . income tax convention . convention between . the government of the united states of america . and the government of \_\_\_\_ for the avoidance of double taxation and the **departmental interpretation and practice notes - no** - inl and revenue department hong kong departmental interpretation and practice notes no. 43 (revised) profits tax profits tax exemption for offshore funds **who framework convention on tobacco control** - who framework convention on tobacco control vi the who fctc opened for signature on 16 june to 22 june 2003 in geneva, and thereafter at the united nations headquarters in new york, the depositary of the treaty, from **treasury department technical explanation of the agreement ...** - treasury department technical explanation of the agreement between the government of the united states of america and the government of the people’s republic of china for the **law on investment - vietnam laws** - © phillips fox translation national assembly socialist republic of vietnam independence - freedom - happiness no. 59-2005-qh11 law on investment **interpretation note 87 (issue 2) act : income tax act 58 ...** - a holder that is a company may hold 10% of the equity shares and voting rights on its own or together with another company that is part of the same group of companies. **departmental interpretation and practice notes - no** - inland revenue department hong kong departmental interpretation and practice notes no. 52 taxation of corporate treasury activity these notes are issued for the information of taxpayers and their tax **chapter 370 investment services act** - investment services [cap. 370.1 chapter 370 investment services act to regulate the carrying on of investment business and to make provision for matters ancillary thereto or connected therewith. **uncitral abitrarion rules (with new article 1, paragraph 4 ...** - uncitral arbitration rules (with new article 1, paragraph 4, as adopted in 2013) uncitral rules on transparency in treaty-based investor-state arbitration **act : income tax act 58 of 1962 section : sections 1(1 ...** - interpretation note 93 (issue 2) date: 17 january 2019 . act : income tax act 58 of 1962 . section : sections 1(1) - definition of “foreign dividend” and 10b **2017 update to the model tax convention - oecd** - this note includes the contents of the 2017 update to the oecd model tax convention (the 2017 update). the 2017 update was provedap by the committee on fiscal affairs on 28 september 2017 and by the **law on customs - vietnam laws** - subscription 45 (5/2001) 31 october 2001 © ministry of planning and investment and vii-734 allens arthur robinson article 4 interpretation of terms in this law, the ... **chapter 14 regional integration - meti.go** - 264 necessarily be seeking to create a fta or customs union, such as asia-pacific economic co-operation (apec) and the asia-europe meeting (asem). **public procurement guidance for practitioners** - public procurement guidance for practitioners on avoiding the most common errors in projects funded by the european structural and investment funds **last will and testament of - netto invest** - testator/ testatrix and witnesses as witnesses: to sign the same time in the presence of each other. testator/testatrix page 2 of 3 5.3 to take over from my estate in whole or in part any asset and investment. **chapter 386 companies act - justice services** - 2 cap. 386.] companies chapter iv provisions applicable to every voluntary winding up 286-294 sub-title iii provisions applicable to every mode of winding up 295-326 chapter i effect of appointment of liquidator and convening of **infrastructure analytical grid for research infrastructure** - 1 infrastructure analytical grid for research infrastructure disclaimer: this is a working document drafted by the services of the european commission for **overview of the french tax system - accueil | impots.gouv** - 6 introduction this handbook describes the broad outlines of the french tax system. first, let us consider two questions: the place of taxation within the system of all mandatory levies, and the place of taxation in **a guide for business how to develop a human rights policy** - 4 a guide for business how to develop a human rights policy 1. overview - what is a human rights policy? a human rights policy can take many forms and has no uniform definition. **central electricity regulatory commission new delhi** - 6 (10) 'commission' means the central electricity regulatory commission referred to in sub-section (1) of section 76 of the act; (11) „communication system'

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includes communication system of power grid corporation of india ltd. covered under unified load dispatch and communication (uld&c) scheme, scada, wide area measurement (wams), fibre optic **2017 arbitration rules - sccinstitute** - 2 arbitration rules of the arbitration institute of the stockholm chamber of commerce adopted by the stockholm chamber of commerce and in force as of 1 january 2017 **immigration - legal affairs** - provisions of the immigration act as authorise or require the payment or imposition of fees in relation to the grant of a work permit to him. \*(3)the aliens (landholding) act shall not apply with respect to an **inland revenue board malaysia residence status of ...** - inland revenue board malaysia residence status of companies and bodies of persons public ruling no. 5/2011 date of issue: 16 may 2011 issue: a page 4 of 15 of assessment 2009). **ufc 3-260-04 airfield and heliport marking - wbdg** - ufc 3-260-04 16 may 2018 foreword the unified facilities criteria (ufc) system is prescribed by mil-std 3007 and provides planning, design, construction, sustainment, restoration, and modernization criteria, and applies **quarterly update 4: tax 2 autumn 2018 - instantcpd** - click to edit master title style (long title) • court of appeal found: •‘the alternative treatment, based solely on the gaap-compliant treatment of the transactions in the books of tpl, would **the wto agreements series sanitary and phytosanitary measures** - sanitary and phytosanitary measures 5 the basic structure of wto agreements the conceptual framework broadly speaking, the wto agreements for the two largest areas of trade — goods

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