Introduction

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Even though several countries have accepted the BEPS results as part of the inclusive framework,¹ its implementation into local legislation varies. For that reason, taxpayers should not shape their analysis of intangibles solely on OECD guidance, it is also necessary to consider the relevant local legislation. Besides countries belonging to the inclusive framework, taxpayers also need to factor in developments in leading global economies such as India and China, which vary significantly from the OECD consensus. The following sections provide an overview of local legislation in more than 20 countries. The country chapters each have a similar structure and reflect local legislation, court decisions, best practice for the valuation of intangibles, and further related aspects, such as the depreciation of intangibles. In addition, a section by Patrick Wittgenstein outlines recent developments with regard to intangibles at the Court of Justice of the European Union.

¹ See <https://www.oecd.org/ctp/beps/inclusive-framework-on-beps-composition.pdf> for the inclusive framework of the OECD.

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