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iv International Transfer Pricing 2015/16 This book provides you with general guidance on a range of transfer pricing issues. Technical material is updated with each new edition and this book is correct as of 30 April 2015. This 2015 edition is the latest development of a work begun over two decades ago and is now in its 15th iteration.

International Transfer Pricing - PwC

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International Transfer Pricing 2015/16, now in its 15th edition is an easy to use reference guide covering a range of transfer pricing issues in nearly 100 territories worldwide. It explains why it is vital for every company to have a coherent transfer pricing policy which is responsive to the rapidly changing markets in which they operate.

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Learn OECD guidance on business taxation in multiple countries. A business that is not aware of all of its exposure to the tax policy of each country in which it does business may find itself paying more in taxes than the share of profit it generates. The Organisation for Economic Co-operation and Development (OECD) seeks to reduce the risk of business taxation in multiple countries. Transfer Pricing Handbook explores how countries can apply the OECD Guidelines to tax businesses that conduct their endeavors in more than one country. It is the ultimate comprehensive guide for companies doing business globally. Helps companies properly price their goods and services for global markets. Provides defenses for transfer pricing audits. Provides standards for creating comparables that multijurisdictional tax administrations will accept. Guides documentation requirements and timing issues. If you're doing business in more than one country, Transfer Pricing Handbook is a must-have, essential guide for simplifying OECD regulations for your global company.

This supplement updates the core volumes, Feinschreiber/Transfer Pricing Handbook, Third Edition (ISBN 0471-406619) and Transfer Pricing International: A Country by Country Guide (ISBN 0471-385239).

This consolidated version of the OECD Transfer Pricing Guidelines includes the revised guidance on safe harbours adopted in 2013, as well as the recent amendments made by the Reports on Actions 8-10 and 13 of the BEPS Actions Plan



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and conforming changes to Chapter IX.

Recent years have seen unprecedented public scrutiny over the tax practices of Multinational Enterprise (MNE) groups. Tax policy and administration concerning international transactions, aggressive tax planning, and tax avoidance have become an issue of extensive national and international debate in developed and developing countries alike. Within this context, transfer pricing, historically a subject of limited specialist interest, has attained name recognition amongst a broader global audience that is concerned with equitable fiscal policy and sustainable development. Abusive transfer pricing practices are considered to pose major risk to the direct tax base of many countries and developing countries are particularly vulnerable because corporate tax tends to account for a larger share of their revenue. This handbook is part of the wider WBG engagement in supporting countries with Domestic Resource Mobilization (DRM) by protecting their tax base and aims to cover all relevant aspects that have to be considered when introducing or strengthening transfer pricing regimes. The handbook provides guidance on analytical steps that can be taken to understand a country's potential exposure to inappropriate transfer pricing (transfer mispricing) and outlines the main areas that require attention in the design and implementation of transfer pricing regimes. A discussion of relevant aspects of the legislative process, including the formulation of a transfer pricing policy, and the role and content of administrative guidance, is combined with the presentation of country examples on the practical application

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and implementation of the arm's length principle and on running an effective transfer pricing audit program. Recognizing the importance of transfer pricing regulation and administration for the business environment and investor confidence, this handbook aims to balance the general objective of protecting a country's tax base and raising additional revenue with investment climate considerations wherever appropriate.

Practical Guide to U.S. Transfer Pricing is a total approach to U.S. transfer pricing For The complex global marketplace. No book on the market today offers you a more thorough approach to transfer pricing rules than Practical Guide to U.S. Transfer Pricing. The tremendous increase in international trade among the nations of the world has made transfer pricing the most important international tax issues for governments. Thus, it is a major problem for major multinational corporations, which are subject to detriments from transfer pricing rules and adjustments, especially double taxation, penalties, And The cost of compliance. Packed with ready-to-use guidelines, detailed examples, and useful tips, Practical Guide to U.S. Transfer Pricing has been specifically designed to help you make today's transfer pricing rules work for your corporation. The book brings together For The first time, a wealth of features that will empower you to deal quickly and efficiently with all transfer pricing issues and problems. You will find: Unsurpassed coverage of U.S. transfer pricing substantive rules Incisive comparisons of the U.S. rules To The international accepted OECD Transfer Pricing Guidelines Information on both

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special and traditional procedures for transfer pricing cases Comprehensive explanations of all major transfer pricing methods, such as the Comparable Uncontrolled Price Method, Cost Plus Method, Comparable Profits Methods, and Profit Split Method Criteria for choosing the best transfer pricing method Ideas on how to cope with the U.S. rules in light of foreign requirements A checklist that multinationals can use in developing an international strategy for transfer pricing compliance A full description of the proposed method of global trading of financial products.

This book provides a concise and pragmatic introduction to transfer pricing. Approaching the subject from an economic and business perspective, it familiarizes the reader with the basic concepts without getting sidetracked by tax law. In turn, the book draws on case studies to demonstrate the identification and application of appropriate transfer pricing methods for the most common intercompany transactions. The intuitive step-by-step guidance, together with integrated Excel-based tools, will equip the reader to ensure compliance with the arm's length principle and thus to minimize tax risk. Based on the post-BEPS OECD Guidelines, the book's content is applicable to a global context.

An overarching look at transfer pricing regimes in Asia-Pacific countries and what they mean for foreign businesses A comprehensive guide for companies doing business globally, Asia-Pacific Transfer Pricing Handbook explains the policies and

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practices that Asia-Pacific countries employ with regards to taxing foreign businesses. The only book that analyzes and guides companies through the often complex transfer pricing rules in place in Asian-Pacific nations, the book explains how authorities in fifteen countries, including ASEAN, India, New Zealand, Japan, and South Korea, tax any company doing business within their borders. Helping foreign companies to properly price their goods and services for global markets, providing defenses for transfer pricing audits, explaining standards for creating comparables that multijurisdictional tax administrations will accept, explaining documentation requirements and timing issues, and creating awareness about inadvertently becoming a permanent establishment, Asia-Pacific Transfer Pricing Handbook is an essential resource for doing business abroad. Provides comprehensive, accessible information on transfer pricing in Asia-Pacific countries Covers fifteen Asia-Pacific countries, including all ASEAN countries, giving readers unparalleled exposure to the different transfer pricing arrangements across the region Explains how companies doing business abroad should price their goods and services for global markets to remain in accordance with the law A complete and comprehensive guide to transfer pricing and its implications for firms and accountants operating in the Asia-Pacific region, Asia-Pacific Transfer Pricing Handbook explains everything foreign companies need to know about doing business abroad.

Transfer pricing continues to be one of the most significant areas of heightened

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controversy in international taxation for multinational enterprises and tax administrations. Due to its far-reaching consequences, tax professionals and individual tax jurisdictions are required to understand the fundamentals of the topic, which is often caught in a maze of literature. Emerging from the joint research conducted by the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law at WU (Vienna University of Economics and Business), the international tax law firm L&P – Ludovici Piccone & Partners, and the experiences from the annual advanced transfer pricing courses and conferences, this first edition of the book acts as a manual for understanding transfer pricing principles and their practical application. It provides a balanced approach by first detailing the basics of transfer pricing and second proceeding to specific topics that are highly relevant in today's tax environment. For the purpose of easy understanding, the book is presented in two parts: Part I: General Topics I. Introduction to Transfer Pricing II. Accurate Delineation and Recognition of Actual Transactions: Comparability Analysis III. Transfer Pricing Methods (Part I): Traditional Transaction Methods IV. Transfer Pricing Methods (Part II): Transactional Profit Methods V. Administrative Approaches to Avoiding/Minimizing Transfer Pricing Disputes VI. Administrative Approaches to Resolving Transfer Pricing Disputes VII. Transfer Pricing Documentation: Master File, Country File and Country-by-Country Reporting Part II: Specific Topics VIII. Attribution of Profits to Permanent Establishments IX. Transfer Pricing and Intra-group Services X. Transfer Pricing and Intra-group Financial Transactions XI. Transfer Pricing and Intangibles XII. Transfer

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Pricing, Supply Chain Management and Business Restructurings XIII. Transfer Pricing and Customs Valuation XIV. Transfer Pricing and EU State Aid In analysing the above topics, the work undertaken by the OECD, UN, EU, World Customs Organization, World Bank, International Monetary Fund and other international organizations is considered. Moreover, the book contains several practical examples, judicial precedents and illustrative explanations to complement the understanding. The book will be a catalyst for immense learning of students and young professionals who are at the introductory stage of understanding the nuances of transfer pricing. Further, the book also caters to tax lawyers, in-house tax counsels and academics working in international organizations, the business community and advisory firms as well as government officials interested in understanding transfer pricing.

Including expert commentary and UK guidance, this second edition comprehensively outlines the general UK principles of transfer pricing and includes matrices of pricing. Contents include: what is it and why does it matter? \* OECD and legislative principles (theory) \* tangible goods transactions \* intra-group services \* financing transactions \* intangibles \* global trading and the allocation of profits to permanent establishment \* transfer pricing planning \* documentation \* eliminating double taxation \* practical difficulties, with arm's length pricing and transfer pricing planning.

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The pricing of goods, services, intangible property and financial instruments within a multi-divisional organization, particularly in regard to cross-border transactions, has emerged as one of the most contentious areas of international tax law. This is due in no small measure to the rise of transfer pricing regulations as governments seek to stem the flow of their tax revenue from their jurisdictions. This thoroughly practical work provides guidance on an array of critical transfer pricing issues. The guide's relevance is further enhanced by the inclusion of country chapters covering domestic transfer pricing issues in a variety of key national jurisdictions.

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