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This handbook is part
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with Domestic
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(DRM) by protecting
their tax base and aims
to cover all relevant
aspects that have to be
considered when

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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 ...

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2018-19 is a publication designed to help international tax executives identify transfer pricing rules, practices and approaches. These must be understood for a company to carry out both transfer pricing compliance and

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iv International
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2015/16 This book
provides you with
general guidance on a
range of transfer
pricing issues.

Technical material is

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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

This 2017 edition of the OECD Transfer Pricing Guidelines

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incorporates the substantial revisions made in 2016 to reflect the clarifications and revisions agreed in the 2015 BEPS Reports on Actions 8-10 Aligning Transfer pricing Outcomes with Value Creation and on Action 13 Transfer Pricing Documentation and Country-by-Country Reporting.

OECD Transfer Pricing Guidelines

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TRANSFER PRICING
METHODS 6 Introduction
to Transfer Pricing
Methods .1 .1. 6 .1 .1 .

This part of the chapter describes several transfer pricing methods that can be used to determine an arm's length price and . describes how to apply these methods in practice. Transfer pricing methods (or "methodologies") are used to calculate or

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**Chapter 6 TRANSFER
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Introduction to ...

The new Draft
Handbook on Transfer
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by the Steering
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Robert Feinschreiber is the editor of Transfer Pricing Handbook, and International Transfer Pricing—A Country-by-Country Guide, both published by John Wiley & Sons, Inc. Mr.

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Transfer Pricing Methods

guide as to how to
identify transfer pricing
and corollary issues,
determine a transfer
pricing method and
document the
considerations and

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determinations.

This Handbook is a useful primer to navigate the contentious issue of transfer pricing.” Alan Winston Granwell DLA Piper LLP (U.S.)

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transfer prices for
direct tax purposes.

The arm's length
principle is generally
accepted as the
international

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Summary: This book
examines many facets
of the 2010 OECD
Transfer Pricing
Guidelines, to make an
analysis for both
multinational

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enterprises and tax administrations. The book is divided into seven parts.

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Transfer pricing and application of the arm's-length principle
The arm's-length principle (ALP) is the cornerstone of the international rules to set transfer pricing (TP) between controlled or

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related-party dealings.

Guidance On The Public Disclosure Authorized A Briefing Note

Transfer Pricing

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