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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

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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

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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

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doing business in more than one country, Transfer Pricing Handbook is a must-have, essential guide for simplifying OECD regulations for your global company.

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This handbook provides a comprehensive analysis of the transfer pricing issues that affect taxpayers and tax collectors alike. It has a practical focus advising taxpayers about transfer pricing techniques and their

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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

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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

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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

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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

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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

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examples on the practical application 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

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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

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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

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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

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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

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Transfer Pricing Rules and Compliance Handbook is a valuable overview and introduction for those involved in transfer pricing decisions in the United States, as well as foreign tax and business professionals with a need to deal with U.S. transfer pricing

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rules. It is the perfect introductory book for practitioners new to transfer pricing issues and business executives and financial managers who need to understand these important principles and rules that impact multinational business entities and operations. The book addresses the growing need for a working level of understanding of

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transfer pricing concepts. Over the last decade, transfer pricing decisions have become more important to multinational entities. The sheer magnitude of potential adjustments, combined with the ability to trigger cross-border tax disputes and the potential to have a material impact on financial reporting, ensures that transfer

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pricing will remain an area of continued corporate vigilance. Given the potential for transfer pricing decisions to globally impact tax, financial and operational results, it is important that financial and operational personnel at multinational entities who are making transfer pricing decisions possess the information they need. This book includes

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topics that will help them to make informed decisions. Such topics include: - the U.S. rules governing transfer pricing - how taxpayers can document transfer pricing determinations to avoid disputes - how to manage a transfer pricing examination - post-examination procedural alternatives to resolve transfer pricing disputes, and much

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more. This book also discusses the advance pricing agreement (APA) procedure, an approach whereby taxpayers prospectively agree with one or more tax authorities regarding their transfer pricing determinations. Finally, it covers the impact of transfer pricing on other tax issues, the impact of transfer pricing on non-tax

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regulatory issues including customs valuations, Section 404 of the Sarbanes-Oxley Act of 2002, and FASB Interpretation No. 48.

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