

Changes Beps Transfer Pricing For Intangibles And Ccas

Changes? BEPs, Transfer Pricing for Intangibles, and CCAS.

This book explores transfer pricing issues related to intra-group financing transactions. It is an invaluable resource for tax practitioners, tax lawyers, tax managers, tax directors of corporations, treasurers and tax authorities, in all facets of transfer pricing and intra-group financing.

The OECD’s Base Erosion and Profit Shifting (BEPS) project promises to make effective inroads into the much criticized corporate tax strategy known as aggressive transfer pricing, whereby the profitability of subsidiaries in different jurisdictions is “managed” via mispricing with the intent of minimizing the corporation’s overall tax burden. Although the OECD BEPS project is an ongoing endeavor, its accomplishments to date and developing trends are discernible. This book, including contributions by outstanding and renowned transfer pricing experts both from practice and academia, analyses these trends, and proposes reforms which would ensure that transfer pricing outcomes are better aligned with economic activities and value creation, which achieves a more equitable distribution of profits among different countries. Each chapter is dedicated to specific sections of the OECD’s BEPS Action Plan. Among the topics and issues covered are the following: – arm’s length principle and its ongoing development; – allocation of risk and recharacterization; – intangibles (both license model and cost contribution arrangements); – interest deductions and intra-group financing; – low value-adding services; – commissionaire arrangements and low-risk distributors; – attribution of profits to permanent establishments; – documentation requirements (including Country-by-Country Reporting). Within these topics, measures to identify the commercial and financial relationships inside multinational enterprises, to accurately delineate actual transactions, as well as guidance on defining risk and its allocation among entities of a multinational enterprise are discussed. The book is based on papers presented and discussed at the first Global Transfer Pricing Conference hosted in February 2016 by the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law at WU (Vienna University of Economics and Business). The most up-to-date and thorough consideration of transfer pricing yet published, this book will prove invaluable for all parties currently facing questions related to transfer pricing in a post-BEPS world, especially those in charge of finding an ideal answer to them:

academics, practitioners (including in-house and advisory counsel), international organizations, CEOs and CFOs of multinational enterprises, and government officials who are tax and transfer pricing experts.

Addressing base erosion and profit shifting (BEPS) is a key priority of governments. In 2013, OECD and G20 countries, working together on an equal footing, adopted a 15-point Action Plan to address BEPS. This publication is the final report for Actions 8-10.

Transfer Pricing Answer Book

Transfer Pricing and Developing Economies

Challenges Ahead for the Financial Services Sector on Technological and Regulatory Change

BEPS Action 8-10 : Aligning Transfer Pricing Outcomes with Value Creation

Transfer Pricing Developments Around the World 2020

This article analyses a foreign court ruling concerning transfer pricing that shows the current tensions in the international tax system relating to one of the main "mantras" derived from the OECD/G20 BEPS Project. It aims to establish a greater connection between the taxation of profits obtained by multinational enterprises (MNEs) and the value creation activities developed by each of the entities located in the different jurisdictions in which they operate. The application of this seemingly simple rule of profit allocation through the alignment between value creation and the taxation of profits of MNEs poses many practical problems and challenges, particularly regarding valuable intangible assets. The article connects the case with the changes introduced by the OECD Transfer Pricing Guidelines 2017 (post-BEPS) regarding marketing intangibles and distribution activities carried out by foreign subsidiaries.

The article argues that the BEPS project has made only minimal progress in its work on the transfer pricing for intangibles, despite the prominence of the issue. More specifically, it achieved none but increased confusion and incoherence in the context of the specific rules for CCAs.

Now in its fourth edition, Global Transfer Pricing: Principles and Practices continues to provide a straightforward and accessible introduction to this complex and increasingly important area of business taxation. It offers readers an overall view of transfer pricing as it is practised today, including the 2017 changes to OECD transfer pricing guidance following the Base Erosion and Profit Shifting (BEPS) initiative. In addition to the theory of transfer pricing, this practical handbook explains how to implement transfer pricing models in global multinationals, how to monitor transactions to ensure compliance and how to create transfer pricing documentation. --

On 13 July 2016, the China State Administration of Taxation (SAT) posted the Announcement on the Enhancement of the Reporting of Related Party Transactions and Administration of Contemporaneous Documentation (Announcement 42). Announcement 42 (dated 29 June 2016) replaces the regulations under Chapters 2, 3, Article 74 of Chapter 7, and Article 89 of Chapter 9 of SAT Circular on Implementation Measures for Special Tax Adjustments (Trial Implementation), Guoshuifa [2009] No. 2. Announcement 42 integrates into Chinese tax regulations the OECD/G20 base erosion and profit shifting (BEPS) Action 13 report recommendations on transfer pricing documentation (i.e., master file and local file). The Announcement also replaces and modernizes the existing related-party transaction reporting forms as specified under SAT Announcement on PRC Annual Reporting Forms on Related Party Transactions, Guoshuifa [2008] No. 114. This article examines the changes to the current transfer pricing documentation requirements and to the related-party transaction forms, and their implications for taxpayers.

Transfer Pricing and the Arm’s Length Principle After BEPS

Transfer Pricing

Does the Revaluation of a Global Brand Determine a Transfer Pricing Adjustment for the Group’s Subsidiaries? A Note to the Thread of the Hyunday Case on the Exploitation of Marketing Intangibles in a Post-BEPS Context

Transfer Pricing Changes in Response to the OECD BEPS Project

Dutch Transfer Pricing Decree Interprets BEPS Changes

The author reviews legislative changes to Mexican transfer pricing rules in response to Actions 8-10 and 13 of the OECD’s BEPS initiative.

Luxembourg companies may enter into diverse commercial and financial transactions with associated enterprises. The prices charged in regard to these controlled transactions are called transfer prices. For Luxembourg tax purposes, these prices have to adhere to the “arm’s length principle”.00The arm’s length principle is the international transfer pricing standard that OECD member countries have agreed should be used for tax purposes by multinational enterprises and tax administrations. The arm’s length principle requires that the consideration for any transaction between related parties conform to the level that would have been agreed if the transaction were to have taken place between unrelated parties under comparable circumstances.00The arm’s length principle is firmly ingrained in Luxembourg tax law and has been explicitly stated in article 56 of the Luxembourg Income Tax Law (LITL). In addition, several concepts and provisions under Luxembourg tax law require the arm’s length standard to be respected by Luxembourg companies.0As a member of the OECD, Luxembourg adheres to the organization’s Transfer Pricing Guidelines which reflect the consensus of OECD Member countries towards the application of the arm’s length principle as provided in article 9(1) of the OECD Model Tax Convention. Notably, this provision is frequently included in tax treaties concluded by Luxembourg.00Transfer pricing and the OECD Guidelines received a lot of attention during the OECD/G20 in their Base Erosion and Profit Shifting (BEPS) initiative. Four of the fifteen BEPS Actions aimed at providing new or changing existing transfer pricing guidance and related documentation requirements. As a result thereof, several chapters of the OECD Guidelines have been significantly amended or replaced in the 2017 Revision thereof.0This book analyses all facets of Luxembourg transfer pricing rules and relevant guidance in the 2017 version of the OECD Guidelines. As such, it should enable readers to deve.

The authors review the current transfer pricing rules in Panama and analyse the impact that the OECD base erosion and profit shifting (BEPS) Project has had there.

Transfer pricing taxation is a significant source of tension between Multinational Firms (MNFs) and tax authorities. The tension relates to the different perspectives of MNFs and tax authorities. MNFs view taxes related to transfer prices as costs to avoid. On the other hand, regulators and tax authorities view taxes related to transfer pricing from the perspective of making sure that MNFs pay their fair share of taxes to the country or territory where MNFs generate profits. Previously, the U.S. was the primary world leader in the area of transfer pricing taxation. The Organization of Economic Cooperation and Development (OECD) have replaced the U.S in this role. The new OECD project titled Base Erosion and Profit Shifting (BEPS) will dramatically change transfer pricing taxation, on a worldwide basis. It also has the potential to affect change in foreign direct investment (FDI). These changes will take place in both developed and underdeveloped countries. This article informs regulators, tax authorities, MNF management, academics, and tax professionals about several major emerging issues related to BEPS. The article also informs accounting and taxation academics about future research needs in this area.

OECD/G20 Base Erosion and Profit Shifting Project Neutralising the Effects of Branch Mismatch Arrangements, Action 2 Inclusive Framework on BEPS

Update of Transfer Pricing Regime in Light of BEPS Actions 8-10 and 13

Impact of International Changes to Hong Kong and Its Reaction

Intangibles, GAAR and BEPS

Changes in the Transfer Pricing Landscape and Impact of the BEPS Project

Addressing base erosion and profit shifting (BEPS) is a key priority of governments. In 2013, OECD and G20 countries, working together on an equal footing, adopted a 15-point Action Plan to address BEPS. This publication is the final report for Action 12.

Value Creation and its effects on Transfer Pricing and tax law Emerging from the OECD/G20 BEPS Project, a new, somewhat fuzzy notion of Value Creation came to permeate not only Transfer Pricing language but also wider allocation rules and anti-abuse provisions in international tax law. The notion of ‘Value Creation’ reframes the interpretation and application of the Arm’s Length Principle (ALP) that is embedded in Articles 7 and 9 of the OECD Model Convention. This new Value Creation notion and approach assist in understanding key enterprise functions while different industry sectors manifest these concepts in various ways. Situating such notions and this approach within the law of tax treaties and analyzing terms of the OECD Transfer Pricing Guidelines alongside their factual context is the aim of this book. Here, law students address Transfer Pricing and Value Creation in sectors as varied as commodities trade, automotive, consumer products, food and beverages, pharmaceutical and life sciences, telecommunications, and the key topic of value creation in a digitalized economy. Our LL.M. students were required to address issues not explored in legal research and to discuss factual topics relevant for Transfer Pricing. All students focused on topics that are new to the international tax debate that keep evolving and on factual matters that often escape legal research.

The OECD’s and G20’s BEPS Action Plan identified the key principles that underlie the taxation of cross-border activities and the BEPS opportunities these principles may create. Financial transactions have been a key area of concern since the beginning of the project. In particular, transfer pricing aspects of financial transactions have been dealt with in BEPS actions 8-10 (Aligning Transfer Pricing Outcomes with Value Creation) and in BEPS action 4 (Limiting Base Erosion Involving Interest Deductions and Other Financial Payments). However, financial transactions have recently gained momentum with the long-awaited OECD report on transfer pricing of financial transactions. Considering that the global tax law landscape is changing considerably, it is important to highlight the impact of these changes on the technological and the regulatory aspects in the financial services sector. With this aim, academics, practitioners, and tax advisors from various countries attended the first Financial Services Transfer Pricing Conference held at Deloitte Vienna on 20 January 2020, to discuss the most relevant transfer pricing topics affecting the financial services sector. This article reports on this conference.

To implement the minimum standards of the BEPS package promulgated by the OECD, the fundamental transfer pricing rules have been recently introduced in Hong Kong. These rules enshrine the arm’s length principle for transactions between associated persons and the attribution of profits to a non-resident person’s permanent establishment in Hong Kong in accordance with the authorized OECD approach (AOA). However, the application of AOA and other recommendations of the BEPS Project may result in different tax implications when compared with the long-standing territorial source principle of taxation in Hong Kong, which is explored in this article.

Increasing Tension Between Multinational Firms and Tax Authorities

Global Transfer Pricing: Principles and Practice

OECD/G20 Base Erosion and Profit Shifting Project Transfer Pricing Documentation and Country-by-Country Reporting, Action 13 – 2015 Final Report

Implementation of BEPS Recommendations in Indonesia’s New APA and Transfer Pricing Rules

Schriftenreihe IStR, Band 116

This article deals with BEPS Actions 8-10. In particular, it deals with the moving of intangibles within a group, shifting of risks and excessive allocation of capital to group entities and internal transactions. The main changes in the OECD Transfer Procing Guidelines are also considered.

Intensive work on transfer pricing, one of the most relevant and challenging topics in the international tax environment, continues to increase worldwide at every level of government and international policy with far-reaching impact on countries’ legislations, administrative guidelines and jurisprudence. This book presents an in-depth, issue-by-issue analysis of the current state of developments along with suggestions for future solutions to the problems raised. Emerging from the 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), this book offers eight topic-based chapters prepared by international experts on transfer pricing. Greatly helping to define recent transfer pricing issues around the world, this book encompasses the following topics: Global Transfer Pricing Developments; Transfer Pricing Developments in the European Union; Transfer Pricing Developments in the United States; Transfer Pricing Developments in Developing Countries and Emerging Economies; Recent Developments on the Tax Challenges Arising from the Digitalization of the Economy (New Nexus Rules); Recent Developments on the Tax Challenges Arising from the Digitalization of the Economy (New Profit Allocation Rules); Recent Developments on Transfer Pricing and Intra-Group Financing; and Recent Developments on the Use of New Technologies for Transfer Pricing Analyses. The intense work of international organizations, such as the Organisation for Economic Co-operation and Development, United Nations and other international organizations, as well as the intense work of the European Union is thoroughly analyzed in this book. The detailed analysis will be of immeasurable value to the various players including international organizations, the business community and advisory firms, corporate CEOs and CFOs, and government officials as well as to tax lawyers, in-house counsel and academics in facilitating efficient dialogue and a coordinated approach to transfer pricing in the future.

Transfer pricing has never had as much media exposure as last year and keeps showing up on the headlines of all major newspapers and other media. Political pressure and the increasing government deficit that is affecting most of the countries are putting a lot of pressure on tax authorities worldwide to fill in the budget gap and are driving a more aggressive and inquisitive approach towards tax payers. The OECD embarked on a very difficult mission with its Base Erosion and Profit Shifting (“BEPS”) project, which started with the G20 in 2012. The world of Transfer Pricing as we know it is changing as the BEPS project continues to raise new issues with the existing structures setup by large multinational and often driven by the desire to achieve better tax efficiency. Although, the BEPS project is well advanced, only few countries have already issued new legislation and amendments to transfer pricing regulations to comply with the new principles from the BEPS project. The lack of clarity on how BEPS will translate in all the different jurisdictions is a concern for not just tax directors, but also CEOs and CFOs. Transfer Pricing Risks Post-BEPS: A Practical Guide explores the issues raised by the BEPS project and offers the readers a practical approach to risk assessment and mitigation in preparation for new legislation and rules to come. The readers are also guided through how supply chain planning is likely to change in the future and how businesses can still ensure their vision and strategy can be implemented whilst minimising risk and improving efficiencies that go hand in hand with real commercial planning.

This report contains revised standards for transfer pricing documentation incorporating a master file, local file, and a template for country-by-country reporting of revenues, profits, taxes paid and certain measures of economic activity. The revised standardised approach and will require taxpayers to articulate consistent transfer pricing positions and will provide tax administrations with useful information to assess transfer pricing and other BEPS risks, make determinations about where audit resources can most effectively be deployed, and, in the event audits are called for, provide information to commence and target audit enquiries. Country-by-country reports will be disseminated through an automatic government-to-government exchange mechanism. The implementation package included in this report sets out guidance to ensure that the reports are provided in a timely manner, that confidentiality is preserved and that the information is used appropriately, by incorporating model legislation and model Competent Authority Agreements forming the basis for government-to-government exchanges of the reports

Centralization of Intangibles and Transfer Pricing Under BEPS and Finnish Tax Law

Transfer Pricing and Intra-group Financing

Transfer Pricing Documentation and Country-by-country Reporting, Action 13, 2015 Final Report

Action Plan on Base Erosion and Profit Shifting

OECD/G20 Base Erosion and Profit Shifting Project Aligning Transfer Pricing Outcomes with Value Creation, Actions 8-10 - 2015 Final Reports

This article discusses principal and holding company structures used by MNE groups, in particular those related to intangibles, including an assessment of such structures under the arm’s length principle of the OECD Transfer Pricing Guidelines and Finland’s domestic transfer pricing legislation. The article examines the pressure to change existing structures as a result of the OECD BEPS Project. Indonesia has recently updated its Advance Pricing Agreement (APA) and transfer pricing regulations in order to capture the development in the business and transfer pricing. It is also aimed to align with the Base Erosion and Profit Shifting (BEPS) recommendations. This article describes the substantial changes. With regards to transfer pricing, the new regulation has made some changes pursuant to the related parties’ definition, transfer pricing methods, comparability analysis procedures, special transactions, and intangibles. The transfer pricing guidance also provides guidance on the financial transactions and introduces the value creation concept. The new definition of related party is broader by providing more examples on the ownership based on control. The regulation also allows the use of other transfer pricing methods other than the five OECD methods. Moreover, the intangible provisions have been modified to reflect the changes in the OECD Transfer Pricing Guideline 2017, to cover development, enhancement, maintenance, protection, and exploitation (DEMPE) activities and the economic owner. 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 and conforming changes to Chapter IX.

Budget 2017 introduced significant changes to Indian transfer pricing regulations. These changes are made in response to recommendations under Action 4 of the OECD/G20 base erosion and profit shifting (BEPS) report and also with the aim to align transfer pricing regulations to global best practices.

Transfer Pricing in Luxembourg

Changes in Transfer Pricing Regulation and Practice

The Future of the Profit Split Method

Global Transfer Pricing: Principles and Practice 4th Edition (Nordic Edition)

OECD/G20 Base Erosion and Profit Shifting Project Mandatory Disclosure Rules, Action 12 - 2015 Final Report

The revised transfer pricing regime created by the 2018 BEPs changes together with changes in focus and practice by Inland Revenue have resulted in substantial changes to our transfer pricing landscape. Companies with overseas affiliates will invariably need to consider their intra-group dealings and the extent to which they may need to analyse and justify to a transfer pricing specialist Mark Loveday. Transfer Pricing is designed to provide readers with a practical understanding of the fundamentals of transfer pricing and the issues surrounding it. New Zealand companies with offshore parents or subsidiaries will find the book invaluable. The Unified Approach issued by the OECD Secretariat on 9 October 2019 is the OECD's most recent attempt to find international consensus on BEPS Action Item 1, "Taxing the Digital Economy". The authors assess that the Pillar One proposals in the Unified Approach suffer from several defects, the most important of which is their apparent abandonment of the arr

Items issued in 2013 was to strengthen the international tax system by removing egregious tax loopholes and ensuring that profits were taxed where economic activities occurred and value was created. In their view, the Pillar One proposals are not "BEPS 2"; they do not share the same agenda, do not build on international tax and transfer pricing principles, and v

current tax and transfer pricing rules, inclusive of BEPS 1 changes, can encompass the digital economy. They offer six policy recommendations designed to move the global economy onto the BEPS 2 path, a path appropriate for 21st century digital multinationals that will benefit both developed and developing countries.

The Future of the Profit Split Method Edited by Robert Danon, Guglielmo Maisto, Vikram Chand & Gabriella Cappelleri Among the various transfer pricing methods, the profit split method (PSM) is under the spotlight after the OECD's Base Erosion and Profit Shifting (BEPS) project. However, both expert analysis and experience indicate that this method is not straight evaluate. In this thorough and detailed commentary – the first book to analyse this increasingly adopted transfer pricing method – notable scholars and practitioners working in the international tax community express their views on the method, answering some unresolved questions and highlighting issues that are still open and pending, especially in light of the dig include the following: choice of the appropriate splitting factors, their relative weights, and valuation of the contributions; uncertainties and outcomes potentially not aligned with the arm's-length standard; possible role of assessments made by the European Commission on State aid; nexus with the work done by the EU Joint Transfer Pricing Forum; impact of profit to digital business models and, in general, to the digitalized economy. Moreover, relevant experience of applying this method in France, Germany, Italy, Spain, Switzerland, the United Kingdom, and the United States is provided. A concluding chapter also deals with selected industry experiences. Due to a high level of uncertainty in alignment with international guidance of current literature on the subject – there is a need for this book because both tax administrations and taxpayers, going forward, will apply the PSM extensively. The book is highly relevant for policymakers, tax administrations, practitioners and academics engaged in the areas of international taxation, transfer pricing and tax policy.

Addressing base erosion and profit shifting (BEPS) is a key priority of governments. In 2013, OECD and G20 countries, working together on an equal footing, adopted a 15-point Action Plan to address BEPS. This publication is the final report for Action 13.

A Handbook for Policy Makers and Practitioners

Taxing the Digital Economy : Pillar One is Not BEPS 2

OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2022

Transfer Pricing Developments Around the World 2019

Recent Trends in Transfer Pricing

The report contains revisions to the OECD Transfer Pricing Guidelines to align transfer pricing outcomes with value creation. The revised guidance focuses on the following key areas: transfer pricing issues relating to transactions involving intangibles; contractual arrangements, including the contractual allocation of risks and corresponding profits, which are not supported by the activities actually carried out; the level of return to funding provided by a capital-rich MNE group member, where that return does not correspond to the level of activity undertaken by the funding company; and other high-risk areas. The report also sets out follow-up work to be carried out on the transactional profit split method which will lead to detailed guidance on the ways in which this method can appropriately be applied to further align transfer pricing outcomes with value creation.

The author considers changes to Polish transfer pricing rules and critically analyses recent approaches of the tax authorities towards the interpretation of transfer pricing provisions. Both legislative changes and interpretative approaches are partly connected with the base erosion and profit shifting (BEPS) Final Reports released in late 2015 by the OECD, which are aimed at reducing possibilities of tax avoidance.

The author reviews recent changes in the Brazilian transfer pricing landscape, as well as the implementation of various recommendations from the OECD base erosion and profit shifting (BEPS) project.

This 2017 report sets out recommendations for branch mismatch rules that would bring the treatment of these structures into line with the treatment of hybrid mismatch arrangements as set out in the 2015 Report on Neutralising the Effects of Hybrids Mismatch Arrangements (Action 2 Report).

Implementing BEPS in China : New Transfer Pricing

OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2017

Changes? BEPs, Transfer Pricing for Intangibles, and CCAS.

Transfer Pricing Risks Post-BEPS: A Practical Guide

This is the first book to present a sustained analysis and critique of arm's length based transfer pricing rules following the G20 / OECD Base Erosion and Profit Shifting (BEPS) project. The book considers the nature and scope of transfer pricing rules based on the arm's length principle starting with an explanation of how the rules were created and how they evolved over time. It provides how internationally accepted transfer pricing rules were applied immediately prior to the BEPS project, and describes the principal problems that had arisen with those rules. The issues highlighted include problems relating to the complexity of the rules, the use and availability of comparables, and, in particular, problems permitting avoidance and income shifting, including problems related to low tax entities with 'excessive capital'. Having described the pre-BEPS rules and inherent problems, the book goes on to examine the extent to which the work undertaken by the BEPs project provides a solid foundation for future transfer pricing determinations and the problems that remain after BEPS. It identifies those issues on which the BEPS output has been positive, and also those issues which BEPS has not successfully addressed and which remain problematic. This book is the most detailed and up-to-date publication on this highly topical and often controversial topic.

Now in its fourth edition, Global Transfer Pricing: Principles and Practices continues to provide a straightforward and accessible introduction to this complex and increasingly important area of business taxation. It offers readers an overall view of transfer pricing as it is practised today, including the 2017 changes to OECD transfer pricing guidance following the Base Erosion and Profit Shifting (BEPS) initiative. In addition to the theory of transfer pricing, this practical handbook explains how to implement transfer pricing models in global multinationals, how to monitor transactions to ensure compliance and how to create transfer pricing documentation. This new edition includes: -An update on the implementation of BEPS recommendations, including artificial avoidance or permanent establishment status and prevention of treaty abuse -Implementation of transfer pricing documentation and country-by-country reporting -Additional case law references Chapter updates include: -Chapter 5 'Financing' has been updated to include commentary on the OECD discussion draft on transfer pricing aspects of financial transactions, including treasury function, guarantee fees and captive insurance -Chapter 7 'Profit Split' has been expanded to cover new guidance on profit split and the recent trend towards the use of this transfer pricing methodology -The 'UK' chapter includes new content on interest restriction rules and transfer pricing, penalties for non-compliance, rules governing the conduct of transfer pricing audits and also Brexit considerations -A new chapter has been added on 'The Attribution of Profits to Permanent Establishments' to cover Articles 7 and 9 of the OECD Model Tax Treaty

This action plan, created in response to a request by the G20, identifies a set of domestic and international actions to address the problems of base erosion and profit sharing.

This article discusses the new Dutch transfer pricing (TP) decree that describes the Dutch Tax Administration's interpretation of the arm's-length principle, in particular on aspects where the OECD Transfer Pricing Guidelines leave room for interpretation or where there is ambiguity.

Transfer Pricing in a Post-BEPS World

Inclusive Framework on BEPS

Transfer Pricing and Value Creation

A Practical Guide for New Zealand Businesses

Transfer Pricing Amendments in Budget 2017

Intensive work on transfer pricing, one of the most relevant and challenging topics in the international tax environment, continues to increase worldwide at every level of government and international policy with far-reaching impact on countries' legislations, administrative guidelines and jurisprudence. This book presents an in-depth, issue-by-issue analysis of the current state of developments along with suggestions for future solutions to the problems raised. Emerging from the 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), this book offers eight topic-based papers prepared by international experts on transfer pricing. Greatly helping to define recent transfer pricing issues around the world, this book encompasses the following topics: Global Transfer Pricing Developments; Transfer Pricing Developments in the European Union; Transfer Pricing Developments in the United States; Transfer Pricing Developments in Developing Countries and Emerging Economies; Recent Developments on Transfer Pricing and Intra-Group Services; Recent Developments on Transfer Pricing and Intra-Group Financing; Recent Developments on the Nexus Rules to Tax Business Profits at Source; and Recent Developments on Attribution of Profits to Digital Permanent Establishments. The intense work of international organizations such as the Organisation for Economic Co-operation and Development, United Nations and other international organizations as well as the intense work of the European Union is thoroughly analyzed in this book. The detailed analysis will be of immeasurable value to the various players including international organizations, the business community and advisory firms, corporate CEOs and CFOs, and government officials as well as to tax lawyers, in-house counsel and academics in facilitating efficient dialogue and a coordinated approach to transfer pricing in the future.

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 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.

In a global economy where multinational enterprises (MNEs) play a prominent role, governments need to ensure that the taxable profits of MNEs are not artificially shifted out of their jurisdiction and that the tax base reported by MNEs in their country reflects the economic activity undertaken therein. For taxpayers, it is essential to limit the risks of economic double taxation.

The Entangled Worlds of Financial Markets and Transfer Pricing