

Robert Feinschreiber

TRANSFER PRICING METHODS

An Applications Guide



Transfer Pricing Methods An Applications Guide

Robert Feinschreiber



Transfer Pricing Methods An Applications Guide:

Transfer Pricing Methods Robert Feinschreiber, 2004-03-08 Advanced praise for Transfer Pricing Methods Feinschreiber and a team of renowned executives have provided the definitive transfer pricing guide to this challenging area At a time when many companies are reviewing documents policies and procedures it s wonderful to have a concise clearly written reference focused on what may be the most critical corporate tax issue Charles R Goulding Managing Director Tax Cooper Industries Inc It is refreshing to find a treatise on transfer pricing that combines practical business considerations economic theory and a discussion of technical tax rules in a way that is meaningful not only for large corporate enterprises but also small and medium sized businesses Vikram A Gosain JD CPA Director of Transfer Pricing General Electric Capital Corporation This well written book will be useful both to attorneys new to the practice area and to older hands It includes very helpful discussions on valuation issues that will be particularly useful for in house counsel and accountants Joseph C Mandarino Partner Troutman Sanders LLP Feinschreiber and his contributors have cogently explained hundreds of useful facets in the transfer pricing field that have taken others volumes to articulate The busy professional should consider this book in his or her quest for knowledge in the scintillating tax specialty Charles L Crowley Partner ITS Customs and International Trade Practice Ernst Young LLP Transfer Pricing Methods should become a standard tool for every owner managed and mid cap multinational Enrique MacGregor Principal in Charge Transfer Pricing Services Grant Thornton LLP Bob s vast experience in transfer pricing matters has again been captured between the covers of a book Thank you Bob and your contributing colleagues for producing another valuable helpmate Alan Getz Vice President and General Manager Tax Mitsui Co Inc U S A Feinschreiber s current publication is a practical handbook that presents transfer pricing tools that can assist tax professionals of mid sized companies to optimize profits manage cash flows and moderate taxes in a defensible manner Per H Hasenwinkle National Practice Leader Transfer Pricing BDO Seidman LLP *The Oxford Handbook of International Business* Alan M. Rugman, 2010-08-26 As globalization explodes so has international business scholarship This second edition of the Oxford Handbook of International Business synthesises all the relevant literature of the last 40 years in 28 original chapters by the world s most distinguished scholars Reflecting the changes and development in the field since the first edition this new edition has a changed structure all the chapters have been updated to take account of the latest scholarship and five new chapters freshly written The Handbook is divided into six major sections providing comprehensive coverage of the following areas History and Theory of the Multinational Enterprise The Political and Regulatory Environment Strategy and International Management Managing the MNE Area Studies Methodological Issues These state of the art literature reviews will be invaluable references for students in business schools social sciences law and area studies

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Transparent cross border operations and expanding digital economies make the strategic importance of transfer pricing agreements greater than ever These agreements sit at the heart of intercompany transactions enabling multinational enterprises to structure document and defend their internal pricing arrangements in line with the arm's length principle while complying with a rapidly evolving landscape of international and domestic tax regulations This book *Transfer Pricing Agreements A Practical Guide* provides a comprehensive practice oriented framework for drafting negotiating implementing and reviewing intercompany agreements across a wide spectrum of business models and industries It is designed for tax professionals legal advisors compliance officers and finance executives who are responsible for navigating the complexity of intra group arrangements while mitigating transfer pricing risk What's Inside Drawing upon both OECD guidelines and jurisdiction specific practices the guide addresses key topics such as Structuring and aligning TP agreements with economic substance and legal enforceability Managing transfer pricing risks in joint ventures strategic alliances and cost sharing arrangements Understanding the implications of digital transformation on TP contracts including platform licensing and algorithmic services Ensuring regulatory compliance under BEPS DAC6 Pillar One and Two and local documentation requirements Drafting defensible contracts that support effective dispute resolution audit readiness and global coordination Chapter Highlights 12 Chapters Foundations of Transfer Pricing Agreements Core definitions compliance roles and strategic importance for multinational enterprises and tax administrations Product and Intangible Property Arrangements Structuring intercompany product supply licensing of technology and trademarks and navigating valuation challenges under OECD guidelines Cost Sharing and Service Agreements OECD frameworks for cost contribution proportional allocation of risks and benefits intra group service pricing and compliance safeguards Financial and Loan Agreements Designing intercompany financing structures determining arm's length interest rates and addressing thin capitalization and BEPS concerns Advance Pricing and Safe Harbor Mechanisms Negotiation processes administrative requirements industry specific regimes and real world case studies to reduce uncertainty Dispute Resolution and Cooperation Mutual Agreement Procedures interagency coordination OECD BEPS Action 14 and practical approaches to avoiding double taxation Emerging Trends and Best Practices Joint ventures digital economy arrangements cloud based cost sharing OECD Pillar One and Two and drafting effective agreements with compliance in mind Each chapter combines conceptual insights with practical examples contract clauses risk alerts and control questions The book also reflects recent developments in international tax policy making it a timely resource for adapting to the post BEPS post Pillar regulatory world About the Author Dr Sergey Mazol is an economist with a PhD in Economics and experience in global trade and tax regulation An advisor to organizations like the OECD WTO and UNECE Mazol combines academic expertise with real world applications making this book an indispensable guide for anyone navigating the challenges of global transfer pricing *QFINANCE* Bloomsbury Publishing, 2014-11-20 *QFINANCE*

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