

Erik Wintzer

Transfer pricing for multinational enterprises. An integrated approach

Diploma Thesis

Transfer Pricing For Multinational Enterprises An Integrated Approach



OECD

Transfer Pricing For Multinational Enterprises An Integrated Approach:

Transfer Pricing for Multinational Enterprises: An integrated Approach Erik Wintzer, 2003 **OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2022** OECD, 2022-01-20 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 OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2017 OECD, 2017-07-10 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

Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations **Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations** OECD, 2017-07-31 *Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations SET* *Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations - Binder+1999 Update* OECD, 1999-11-12 **OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2009** OECD, 2009-08-18 OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations provides guidance on the valuation for tax purposes of cross border transactions between associated enterprises **Transfer Pricing and Multinational Enterprises** OECD, 1979-06-01 The OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations provide guidance on the application of the arm's length principle which is the international consensus on transfer pricing i.e. on the valuation for tax purposes of cross border transactions between associated enterprises In a global economy where multinational enterprises MNEs play a prominent role transfer pricing is high on the agenda of tax administrators and taxpayers alike Governments need to ensure that the taxable profits of MNEs are not artificially shifted out of their jurisdictions and that the tax base reported by MNEs in their respective countries reflect the economic activity undertaken therein For taxpayers it is essential to limit the risks of economic double taxation that may result from a dispute between two countries on the determination of an arm's length remuneration for their cross border transactions with associated enterprises Following this original 1979 publication the OECD Transfer Pricing Guidelines were approved by the OECD Council in their original version in 1995 A limited update was made in this 2009 edition primarily to reflect the adoption in the 2008 update of the Model Tax Convention of a new paragraph 5 of Article 25 dealing with arbitration and of changes to the Commentary on Article 25 on mutual agreement procedures to resolve cross border tax disputes A subsequent edition was released in 2010 in which Chapters I-III were substantially revised with new guidance on the selection of the most appropriate transfer pricing method to the circumstances of the case the practical application of transactional profit methods transactional net margin method and

profit split method and on the performance of comparability analyses Furthermore a new Chapter IX on the transfer pricing aspects of business restructurings was added Consistency changes were made to the rest of the Guidelines Digitised document Electronic release on 24 11 2011

Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2001 Travel version OECD,2001-06-26 The 2001 edition of Transfer Pricing Guidelines was substantially revised in July 2010 See the current edition This compact version of Transfer Pricing Guidelines provides the complete and current text of the OECD pricing guidelines accepted by

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Transfer Pricing and Customs Valuation Anuschka Bakker,Belema Obuoforibo,2009 This book discusses the intricate role of transfer pricing and customs value in international business environment It examines the relationship between valuation for transfer pricing purposes and valuation for customs and the significance of the relationship for multinational enterprises tax authorities and customs administrations The book begins by reviewing relevant international standards such as the OECD Guidelines and the GATT WTO Customs Valuation Agreement This is followed by a discussion of related issues such as VAT and administrative matters Country chapters provide an overview of the applicable legislation and valuation methods and case studies allow direct comparison between the practices of the different countries The book concludes by summarizing the existing relationship between transfer pricing valuations and customs valuations and by suggesting possible solutions towards a more integrated approach

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