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lecture 2 - Kyung Geun Lee OECD

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agreed in the 2015 BEPS Reports on
Actions 8-10 Aligning Transfer pricing
Outcomes with Value Creation and on
Action 13 Transfer Pricing
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OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2017 DOI: <https://dx.doi.org/10.1787/tpg-2017-en> This consolidated version of the OECD Transfer Pricing Guidelines includes

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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.

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On 10 July 2017, the Organisation for
Economic Co-operation and
Development (OECD) released the
latest edition of its Transfer Pricing
Guidelines for Multinational
Enterprises and Tax Administrations

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(“the Manual” or “OECD TPG ”).

The Manual was originally published by the OECD Council in 1995 and was subsequently updated in 1996 and 1997. Prior to the release of the 2017 edition, the last revision to the Manual was made in 2010.

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The OECD Transfer Pricing Guidelines for Multinational Enterprise and Tax Administrations provide guidance on the application of the “ arm ’ s length principle ” , which is the

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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 continues to be high on the agenda of tax

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the application of the “arm ’ s length principle ” , which is the international consensus on transfer pricing, i.e. on the

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On June 27, 1995 the first draft of the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations (“ OECD Guidelines ”) was published. These Guidelines are a revision of the OECD Report Transfer Pricing and Multinational Enterprises that was

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published in 1979. Since then, the OECD Guidelines have been continually developed and updated which resulted in the current OECD Guidelines.

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The transfer-pricing rules are found in the regulations under Sec. 482 and the OECD's Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations, and the arm's-length principle. In addition, local jurisdictions may have

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Additional transfer-pricing mandates that must be considered.

Blockchain technology firms ' transfer-pricing issues
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Transfer pricing rules govern transactions within multinational groups, targeting firms seeking to shift profits and stopping taxpayers increasing expenses or reducing income through dealings with ...

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Data and research on transfer pricing
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Administrations, transfer pricing
country profiles, business profit
taxation, intangibles

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Transfer pricing - OECD

Transfer pricing refers to the internal pricing system used between related parties. It determines how much profit is reported and the tax rate to be paid. Transfer pricing is especially

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important for taxpayers as well as national and international tax authorities as they are responsible for managing cross-border flows within a multinational enterprise (MNE).

What is transfer pricing?

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Country Reporting. It also includes the revised guidance on safe harbours approved in 2013 which recognises that properly designed safe harbours can help to relieve some ...

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Diese aktualisierte Ausgabe der "OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations" enthält umfangreiche Überarbeitungen aus dem Jahr 2016: Präzisierungen und Änderungen, die auf BEPS-Berichten

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Multinational OECD
zu Aktionsplänen 8-10 zur Anpassung
von Verrechnungspreisergebnissen
an die Wertschöpfung basieren bzw.
zu Aktionsplan 13 zu Melde- und
Dokumentationsverfahren.

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purposes of cross-border transactions
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OECD Transfer Pricing Guidelines

2017 - New version

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Development (OECD) has published the "Transfer Pricing Guidelines for Multinational Enterprise and Tax Administrations" (OECD guidelines). The OECD guidelines are constantly updated and updates in support of the OECD's project on Base Erosion and Profit Shifting (" BEPS ") will be

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included in the next release of the OECD guidelines.

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Transfer Pricing Aspects of Business
Restructurings It builds up on Article
9 of the OECD Model Tax Convention

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on Income and Capital ("Associated Enterprises"). It revolves heavily around the arm's length principle, exploring the practical application of the concept in more detail and in multiple facets.

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