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Guidelines For
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[OECD Tax] Concept
of Transfer Pricing
and Arm ' s Length
Principle Lecture 1-
Kyung Geun Lee Tax
Takes Episode 4: A
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~~why multinational
companies need to
pay attention~~

Transfer Price

Manipulation [OECD

Tax] Transfer Pricing

Methods 1 lecture 2 -

Kyung Geun Lee

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the Finish Line

Transfer Pricing 2015

What is Transfer

Pricing? Why does

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TRANSFER PRICING
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What is transfer pricing? by e-Bright
What is TRANSFER PRICING? What does TRANSFER PRICING mean? TRANSFER PRICING meaning

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International
Transactions with
related parties and

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Applicability

Decoding Enhanced

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BDO Global Webinar
The Impact of COVID
19 on Your Transfer
Pricing Arrangements

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Enterprises and Tax

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Administrations For

2017. This 2017
edition of the OECD
Transfer Pricing

Guidelines

incorporates the
substantial revisions
made in 2016 to
reflect the

clarifications and
revisions agreed in
the 2015 BEPS

Reports on Actions

8-10 Aligning

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Guidelines For
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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 the revised guidance on safe harbours adopted in 2013, as well as the recent

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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

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Economic Co-
operation and
Development (OECD)
released the latest
edition of its Transfer
Pricing Guidelines for
Multinational
Enterprises and Tax
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(“ the Manual ” or
“ OECD TPG ”). The
Manual was originally
published by the
OECD Council in 1995

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Corporations
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 international consensus on transfer pricing, i.e. on the valuation for tax purposes of cross-

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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
administrations and
taxpayers alike.

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The OECD Transfer
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Administrations
provide guidance on
the application of the
“ arm ’ s length
principle ” , which is
the international
consensus on transfer

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On June 27, 1995 the
first draft of the OECD
Transfer Pricing
Guidelines for
Multinational
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(“ OECD

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Guidelines”) was published. These Guidelines are a revision of the OECD Report Transfer Pricing and Multinational Enterprises that was published in 1979. Since then, the OECD Guidelines have been continually developed and updated which

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resulted in the For
current OECD
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The transfer-pricing
rules are found in the
regulations under
Sec. 482 and the
OECD's Transfer
Pricing Guidelines for

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Multinationals For
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Administrations, and
the arm's-length
principle. In addition,
local jurisdictions
may have additional
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mandates that must
be considered.

Blockchain
technology firms '

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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

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

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rate to be paid. For

Transfer pricing is especially 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).

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This 2017 edition of the Oecd Transfer Pricing Guidelines incorporates the substantial revisions made in 2016 to reflect the clarifications and revisions agreed in the 2015 Beps Reports on Actions 8-10 Aligning Transfer pricing Outcomes with Value

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Documentation and
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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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BEPS-Berichten zu
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The OECD Transfer
Pricing Guidelines for
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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

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Guidelines For
purposes of cross-
border transactions
between associated
enterprises.

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Guidelines 2017 -
New version
Since 1979, the
Organisation of
Economic Co-
operation and
Development (OECD)

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

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"") will be included in
the next release of
the OECD guidelines.

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Aspects of Business
Restructurings It
builds up on Article 9
of the OECD Model
Tax Convention on
Income and Capital

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("Associated For
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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