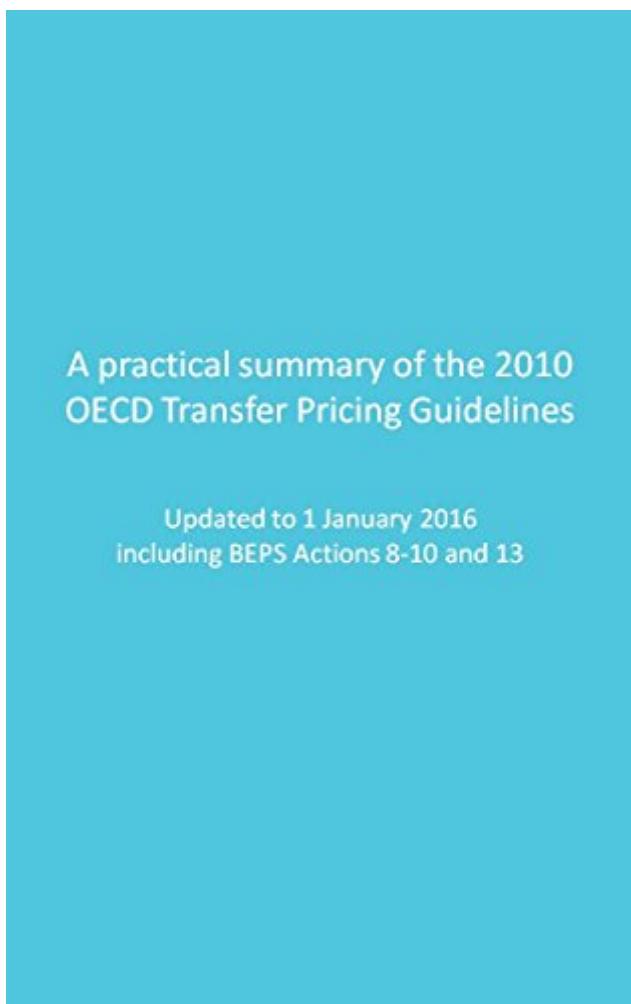


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A Practical Summary Of The 2010 OECD Transfer Pricing Guidelines: Updated To 1 January 2016, Including BEPS Actions 8-10 And 13



Synopsis

How many of us still have time to read 375+ page guidelines? How many of us have time to take those guidelines and combine them with chapters adopted after the guidelines were published? How does a student begin to study a work of this size, without getting hopelessly lost? The book also includes the since 2010 adopted texts for Chapters IV E (safe harbours) and BEPS actions 8 â€“ 10 and 13 (new chapters 1.D, paragraph 2.16 on commodities, chapter V on documentation, VI on Intangibles, VII on intra-group services and VIII cost contribution agreements). In this book, the 2010 OECD Transfer Pricing Guidelines and subsequent amendments are summarized three times: first as a one-page overview, then as a longer executive summary and finally as an extended summary of most of the paragraphs of the 2010 OECD Transfer Pricing Guidelines. The extended summary references the actual paragraphs in the 2010 OECD Transfer Pricing Guidelines. As the 2010 OECD Transfer Pricing Guidelines is a live document, which is continuously updated, I have substituted existing 2010 OECD Transfer Pricing Guidelines chapters and paragraphs with draft and final material published after 2010. These texts are clearly marked and primarily concern chapters I.D on comparability, II on commodities, IV on safe harbours, V on transfer pricing documentation, VI on intangibles, VII on intra-group services and VIII on cost contribution agreements. The book follows the order of topics as given in the actual guidelines. This book is only descriptive: I have not given my opinion about the choices made, though it is difficult to make a summary without some degree of interpretation.

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