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OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations

2010 Edition and

Transfer Pricing Features of Selected Countries 2011

Editors: Kamesh Surarla (IBFD) and Antoine Glaize (Taxand)

Why this book?

The increase in global trade and foreign direct investment has seen a large rise in companies operating across national borders. The growth of these multinational companies (MNCs) has been closely followed by the issue of inter-company transfer prices being used to reduce taxable profits. Today, transfer pricing is one of the most important issues facing MNCs as they attempt to fairly distribute their profits amongst each company in the group while dealing with tax authorities who are implementing transfer pricing regulations and strengthening enforcement in order to prevent a loss of revenue. The result of which is that transfer pricing controversies have become a major tax issue for companies.

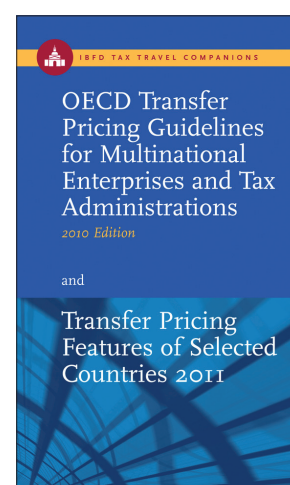
This reference booklet, in addition to containing the OECD's Transfer Pricing Guidelines, provides an excellent overview of transfer pricing rules and regulations in 35 countries and is a handy guide for those actively working in the field of transfer pricing.

About the editors

Kamesh Surarla is a Senior Research Associate with IBFD's Asia-Pacific Knowledge Group. His areas of responsibility primarily include India, Pakistan, Bangladesh and Sri Lanka amongst other countries in South Asia. Mr. Surarla is also a regular author for the Asia Pacific Tax Bulletin of the IBFD and a speaker at various courses organized by IBFD.

Antoine Glaize is the Taxand Global Transfer Pricing Team leader which brings together Taxand transfer pricing specialists from nearly 50 countries. He is also a partner with Arsene Taxand, Taxand France. Antoine focuses on delivering global transfer pricing projects for MNCs relying on his breadth of experience over the last 15 years. As well as his time with the French Ministry of Economy, Finance and Industry, where he was in charge of transfer pricing and advance pricing agreements, Antoine has worked clientside and in top global accountancy firms.

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