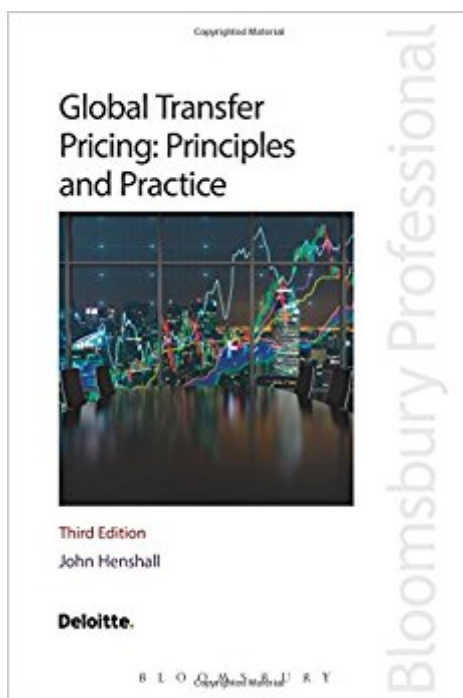


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Global Transfer Pricing: Principles And Practice: Third Edition



Synopsis

Now in its third edition, *Global Transfer Pricing: Principles and Practice* continues to provide a straightforward and accessible introduction to this complex and increasingly important area of business taxation. It offers readers an overall view of transfer pricing as it is practised today, including the recent changes to OECD transfer pricing guidance following the Base Erosion and Profit Shifting (BEPS) initiative. In addition to the theory of transfer pricing, this practical handbook explains how to implement transfer pricing models in global multinationals, how to monitor transactions to ensure compliance and how to create transfer pricing documentation. The updated third edition has been revised to cover the 2015 OECD BEPS report on Actions 8-10 and Action 13, released in September 2015. It features new chapters on profit split and operational transfer pricing with significant revisions to many other chapters. It also includes a quick comparative reference to differing global transfer pricing rules and access to Deloitte's 2016 Global Transfer Pricing Guide, an indispensable source of information on the transfer pricing regimes in more than 65 jurisdictions around the world. This authoritative and comprehensive guide covers the following key topics: Transfer pricing: what is it? OECD Types of transactions: tangible goods Types of transactions: intra-group services Financing Intangible property Profit split Business restructuring Transfer pricing documentation Operational transfer pricing Tax audits and eliminating double taxation UK transfer pricing legislation Transfer pricing is now 'centre stage' for tax directors, senior management and tax advisers along with journalists, politicians, pressure groups and the public. Yet many outside of the tax profession, even those who hold strong views about transfer pricing, do not actually understand what it is and how it works. *Global Transfer Pricing: Principles and Practice* is essential reading for anyone who wants to learn more about this important international tax compliance tool. John Henshall has over 30 years' experience in international taxation and for the past 14 years has been a transfer pricing partner at Deloitte. He represents Deloitte at OECD and was a delegate to both WP1 (considering Article 5 of the Model Tax Treaty) and WP6 (considering revisions to the OECD Transfer Pricing Guidelines). He is regularly published on transfer pricing matters. [Subject: Tax Law, Commercial Law]

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John Henshall has 30 years' experience in international taxation and for the past 12 years he has been a transfer pricing partner at Deloitte. He represents Deloitte at OECD and was a delegate to both WP1 (considering Article 5 of the Model Tax Treaty) and WP6 (considering the revision to Chapter 6 of the OECD Transfer Pricing Guidelines). He is regularly published on transfer pricing matters and was author of the 2nd edition of Global Transfer Pricing: Principles and Practice.

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