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A Practical Summary Of The July 2017 OECD Transfer Pricing Guidelines

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OECD Transfer Pricing Guidelines

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Synopsis

How many of us still have time to read 600+ 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? This book reflects my love for systematic thinking and reducing clutter. It is aimed at giving fast, accurate, information through diagrams and summaries. In this book, the 2017 OECD Transfer Pricing Guidelines 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 2017 OECD Transfer Pricing Guidelines. The extended summary references the actual paragraphs in the 2017 OECD Transfer Pricing Guidelines. As the 2017 OECD Transfer Pricing Guidelines is a live document, which is continuously updated, I will substitute existing the 2017 OECD Transfer Pricing Guidelines chapters and paragraphs with draft and final material published after 2017. These texts are clearly marked and will first concern the profit allocation to PEs, the profit split method and financial transactions, when those documents are finalised by the OECD. All references within the book are hyperlinked for fast and easy reading between texts. This book does not pretend to be a replacement of the 2017 OECD Transfer Pricing Guidelines; it is an introduction, giving an overview of the wide variety of topics covered, with paragraph references to the underlying Guideline paragraphs, so that we know where to find them. The original work can be bought from the OECD at <http://www.oecd.org/tax/transfer-pricing/oecd-transfer-pricing-guidelines-for-multinational-enterprise-s-and-tax-administrations-20769717.htm>. For more information about me, please see my website (www.johannmuller.net), my YouTube channel, Taxpics (<https://www.youtube.com/user/taxpics>) and my LinkedIn profile (<https://www.linkedin.com/in/johannhmuller>).

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