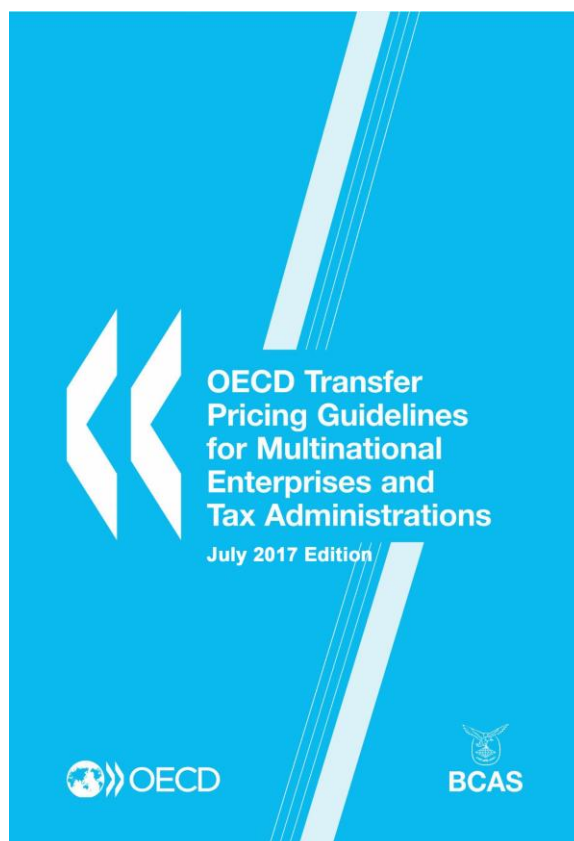


BCAS KNOWLEDGE RESOURCE UPDATE



Title:	OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations
Features:	<p>BCAS publishes (OECD) Transfer Pricing Guidelines in India in the form of a book. OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2017 Provide guidelines on the application of “arm’s length principle “, which is the international consensus on transfer pricing that is on valuation of tax purpose of cross border transaction between associated enterprises. In the global economy when multinational enterprises (MNEs) play a prominent role, transfer pricing continues to be high on agenda on tax administration and taxpayers alike.</p> <p>This 2017 edition incorporated the substantial revisions made in 2016 to reflect the clarification and revision agreed in the 2015 BEPS Reports on Action 8-10 Aligning Transfer Pricing Outcomes with value creation and on action 13 Transfer Pricing Documentation and Country by Country reporting. It also includes the revised guidance on safe harbors approved in 2013 which recognizes that properly designed safe harbors helps to relieve some compliance burden and taxpayers with great certainty. Finally, This edition also contains consistency changes that were made to rest of the OECD Transfer pricing Guidelines. The OECD Transfer Pricing Guidelines were approved by the OECD Council in their original version in 1995.</p>

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