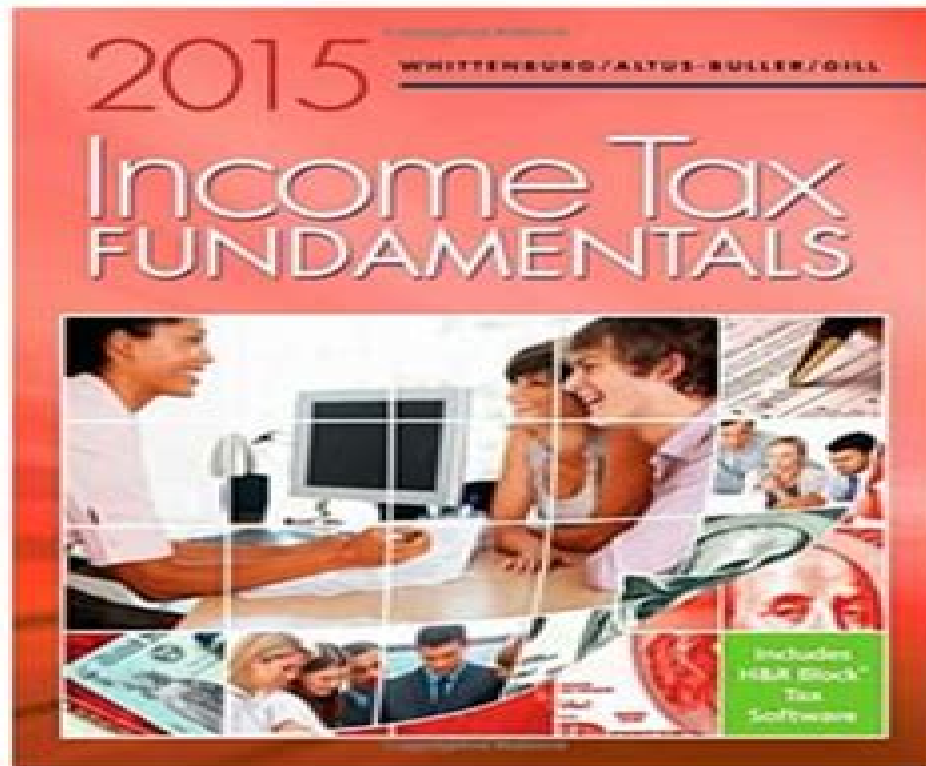


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for understanding transfer pricing principles and their practical application. It provides a balanced approach by first detailing the basics of transfer pricing and second proceeding to specific topics that are highly relevant in today's tax environment. For the purpose of easy understanding the book is presented in two parts: Part I General Topics I Introduction to Transfer Pricing II Accurate Delineation and Recognition of Actual Transactions Comparability Analysis III Transfer Pricing Methods Part I Traditional Transaction Methods IV Transfer Pricing Methods Part II Transactional Profit Methods V Administrative Approaches to Avoiding Minimizing Transfer Pricing Disputes VI Administrative Approaches to Resolving Transfer Pricing Disputes VII Transfer Pricing Documentation Master File Country File and Country by Country Reporting Part II Specific Topics VIII Attribution of Profits to Permanent Establishments IX Transfer Pricing and Intra group Services X Transfer Pricing and Intra group Financial Transactions XI Transfer Pricing and Intangibles XII Transfer Pricing Supply Chain Management and Business Restructurings XIII Transfer Pricing and Customs Valuation XIV Transfer Pricing and EU State Aid. In analysing the above topics the work undertaken by the OECD UN EU World Customs Organization World Bank International Monetary Fund and other international organizations is considered. Moreover the book contains several practical examples judicial precedents and illustrative explanations to complement the understanding. The book will be a catalyst for immense learning of students and young professionals who are at the introductory stage of understanding the nuances of transfer pricing. Further the book also caters to tax lawyers in house tax counsels and academics working in international organizations the business community and advisory firms as well as government officials interested in understanding transfer pricing.

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