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14 Transfer

Pricing

strategies in

times of great

uncertainty An

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*Introduction to  
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Danielle Donovan

- Transfer  
pricing risks  
and challenges  
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2015 Transfer  
pricing  
implications in  
a post-BEPS and  
post-US tax  
reform  
environment ~~New~~



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Pricing Guidance  
Risk Assessment in  
The~~  
Transactions

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- Transfer  
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Implications  
Across The Globe

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Richard Collier  
on Transfer  
Pricing and the

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Principle BDO PPN  
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*Transfer Pricing  
- The Basics*

~~Transfer Pricing  
Method: Profit~~

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Transfer pricing

basics

The Future of

Transfer Pricing

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EY Interview

Questions

Transfer pricing  
and tax havens |

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Plus Method |

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Profits Method |

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Method |

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to Manage

Exposure to Risk

on Tax and

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*Small*

*Businesses?*

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~~The~~ Key Strategies  
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Multinationals |  
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and Intercompany  
Billing with  
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Normal -  
Business Unusual  
The  
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~~aspects of~~  
~~financial~~  
~~transactions: A~~  
~~moveable feast~~  
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Risk

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in the African

Mining Industry

STRUCTURE OF THE

TOOLKIT The

toolkit is

divided into

four sections,

mirroring the

issues outlined

above: marketing

arrangements,

intercompany

debt,

procurement



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management  
Risk Assessment In  
services. Each  
The section begins  
with an  
information  
checklist that  
details all the

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Risk Assessment  
in the ...

Abstract: The

*Page 17/54*

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Transfer Pricing  
Administration  
Forum (ATAF) and  
the German  
Federal Ministry  
for Economic  
Cooperation and  
Development  
(BMZ), through  
the Deutsche  
Gesellschaft für  
Internationale  
Zusammenarbeit  
(GIZ) GmbH, have

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African tax

authorities

seeking to

assess transfer

pricing risk in

the mining

industry. The

purpose is to

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authorities'

capacity to

determine

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whether they  
should audit  
particular high-  
risk "related  
party  
transactions."

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in the ...

The Transfer  
Pricing Risk  
Assessment Tool

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Transfer Pricing  
Risk Assessment In  
The

is intended to be used primarily by tax authorities in resource-rich developing countries. It addresses the transfer mispricing challenge by offering user-friendly, step-by-step guidance

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on how to determine  
whether  
The transactions in  
the extractive  
sector should be  
subject to  
transfer pricing  
audits.

New Publication:  
Toolkit for  
Transfer Pricing  
Risk ...

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German Federal  
Ministry for  
Economic

Cooperation and  
Development have  
developed a  
toolkit for  
African tax  
authorities  
seeking to  
assess transfer  
pricing risk in  
the mining

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industry. The purpose is to strengthen the competent authorities' capacity to determine whether they should audit particular high-risk "related party transactions."



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Risk Assessment

The

Toolkit for ...

Toolkit For

Transfer Pricing

Risk Toolkit for

Transfer Pricing

Risk Assessment

in the ... The

toolkit employs

a specific risk

review approach,

which focuses on

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particular Pricing  
transfer pricing  
Risk Assessment in  
issues that  
The  
present a high  
risk to revenue  
(as distinct  
from a  
comprehensive  
risk review,  
which tax  
authorities use  
when they cannot  
detect where  
transfer ...

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The

This toolkit, in draft version, is intended to provide an analysis of policy options and a "source book" of

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Toolkit For  
guidance and  
examples to  
assist low  
capacity  
countries in  
implementing  
efficient and  
effective  
transfer pricing  
documentation  
regimes.

TP Toolkit; a  
new guide |

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A New Era In  
Transfer Pricing  
Risk Assessment.

A toolkit for  
Transfer Pricing  
Risk Assessment  
in the African  
Mining Industry  
was launched in  
September this  
year by the  
African Tax  
Administration  
Forum (ATAF) at

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Toolkit For  
its Transfer Pricing  
International  
Risk Assessment In  
Conference on  
The Tax in Africa  
(ICTA). This  
toolkit signals  
the next wave of  
intensified  
effort by tax  
administrations  
in Africa in the  
area of transfer  
pricing.



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## Toolkit For

### A New Era In Transfer Pricing Risk Assessment

#### 1.1

Introduction:

why a toolkit on  
implementing  
Transfer Pricing  
documentation?

The relevance of  
transfer pricing  
to developing  
countries ,  
together with

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## Toolkit For

the challenges  
faced by low-  
capacity or  
inexperienced  
tax  
administrations,  
has been high on  
the regional and  
global tax  
agenda in the  
last several  
years.

Practical

*Page 34/54*

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Toolkit to  
support the  
successful  
implementation

...

The toolkit,  
"Addressing  
Difficulties in  
Accessing  
Comparables Data  
for Transfer  
Pricing  
Analyses",  
specifically

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## Toolkit For

addresses the ways developing countries can overcome a lack of data needed to implement transfer pricing rules. This data is needed to determine whether the prices the enterprise uses accord with

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those which  
would be  
expected between  
independent  
parties.

The Platform for  
Collaboration on  
Tax delivers a  
toolkit ...

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chapter 7 test  
answers,  
solution chapter  
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whether they  
should audit  
particular high-  
risk "related  
party  
transactions."

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Risk Assessment  
Toolkit for the

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### Mining . . .

The Transfer  
Pricing

Examination

Process (TPEP)

supplants the  
Transfer Pricing  
Audit Roadmap

(Roadmap), a

2014 toolkit

designed to

provide IRS

examiners with

audit

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Techniques,  
advice, links  
and reference  
materials that  
may be helpful  
in planning,  
executing and  
resolving  
transfer pricing  
examinations.

US IRS publishes  
new guide on  
transfer pricing

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Risk Assessment

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Assessment In

The Keywords:  
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The toolkit is  
the first of its  
kind addressing  
mining. It aims

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to assist African tax  
authorities to  
determine  
whether  
particular high-  
risk related  
party  
transactions  
should be  
selected for  
transfer pricing  
audit. The  
toolkit is

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complementary to  
and supplements  
the ATAF

The  
Transfer Pricing  
Risk Assessment  
Tool, which  
applies to all  
sectors.

New Toolkit Aims  
to Curb Transfer  
Mispricing in  
African ...

The purpose of

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introducing the  
new transfer  
pricing risk  
assessment tool

is to provide  
tax authorities  
with quick and  
transparent  
information on  
transfer  
pricing.

However, the  
simplifications  
proposed will



# Read Book Toolkit For probably cause plenty of misunderstanding and the

necessity to  
provide further  
explanation in a  
separate form or  
in transfer  
pricing  
documentation on  
ad hoc basis.

Poland issues

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## Toolkit For

### Controversial transfer pricing risk ...

The new Poland transfer pricing risk assessment tool requires taxpayers to include general information about the taxpayer, including financial

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### indicators Pricing concerning financial The conditions

(operational margin, gross profit margin, return on assets, return on capital).

Specific formulas are provided to calculate these

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indicators. Pricing  
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New Poland  
The transfer pricing  
risk assessment  
tool released

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Zusammenarbeit  
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