

United Nations Practical Manual on Transfer Pricing for Developing Countries

ECOSOC Special Meeting on International Cooperation in Tax Matters

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Stig Sollund

Coordinator of the Subcommittee on Transfer Pricing

Practical Transfer Pricing Manual 2017 Update

- What is it and what is it for?
- Link to Article 9 of the UN Model Convention and its Commentary
- Main items of the 2017 update
 - New four parts format
 - Additional chapters; services, intangibles, cost sharing and restructuring
 - Taking account of the outputs of the G20/OECD BEPS Project
 - Revised guidance on comparability analysis; establishing relevant facts
 - Revised guidance on documentation
 - Additional section on Commodity transactions in Methods subchapter
 - Revised and extended informative chapters on some Country Practices

Warm thanks to all who contributed

- Members of the Subcommittee
- Supporting Governments hosting meetings
- European Commission supporting meetings
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- The Ffd Secretariat: Michael Lennard