



Transfer Pricing and Corporate Taxation

Elizabeth King

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This publication will be a useful tool for practitioners and tax directors grappling with the complex and contentious issue of transfer pricing. It contains a series of highly detailed case studies, based on the author's twenty-one years as a government economist specializing in transfer pricing and valuation, a transfer pricing economist with Price Waterhouse, and, lastly, an independent consultant. These case studies elucidate the types of intercompany transactions that may be scrutinized by tax authorities, lay out how one should go about analyzing these transactions in painstaking detail, and suggest how one might assess tax exposure relating to transfer pricing. Tax policy analysts will find the evaluation and critique of existing methods and the development of alternative proposals thought-provoking and compelling.

The book is split into two parts: The first part describes and critically analyses the transfer pricing methods and regulations currently in place and proposes alternative approaches. The second part consists of ten case studies.

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