



Transfer Pricing

Transfer pricing and the associated risks are becoming more and more a boardroom issue for multinational groups as countries are looking to secure their share of tax revenue in cross border business transactions. These risks are becoming unavoidable as intra-group arrangements become more transparent globally to revenue authorities around the globe through transfer pricing documentation such as local files, master files and country by country reports. This will expose multinationals to a range of questions from tax authorities, controversy risks and higher tax liabilities. This publication series highlights how transfer pricing considerations should be reflected in commercial and legal arrangements and ways to manage potential transfer pricing disputes.

ISSUES

The use of the interquartile range in transfer pricing¹

7 November 2019

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This article first provides an overview of international guidance, after which a comparative analysis of a sample of countries' legislation is provided. The authors then conclude with their thoughts and considerations regarding the current practice.

Global Tax Alert: DLA Piper hosts TRIBUTE event discussing developments in international tax arbitration and dispute resolution mechanisms

7 October 2019

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DLA Piper hosted "An Evening with Tribute" during IFA week in London. The event brought together the most highly regarded experts in their field to discuss the latest developments in international tax arbitration and other dispute resolution instruments.
