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purpose of transfer pricing rules the arm's length principle and its application the consequences of a transaction not being in accordance with the arm's length principle the transfer pricing methods the mechanisms to avoid and resolve disputes the transfer pricing documentation the attribution of profits to permanent establishments the transfer pricing aspects of specific transactions such as services financing intangibles and business restructurings The application of transfer pricing legislation is arguably the most difficult task that taxpayers and tax authorities around the world must face With this authoritative source of practical guidance government officials tax lawyers in house tax counsel academics advisory firms the business community and other stakeholders worldwide will have all the detail they need to move forward in tackling this thorny aspect of the current tax environment

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