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Development (“OECD”) issued an updated version of its Transfer Pricing Guidelines for Multinational Enterprises and Tax

**tax alert: oecd releases first update since 2017 to transfer pricing guidelines**
SARS has released a new draft interpretation note that will help to clarify issues around intra-group loans, but several key issues still need to be addressed. Debt is an important source of financing.

**new draft interpretation note on intra-group financial transactions brings welcome clarity**
In a bid to guide taxpayers and tax administrators to such amendment.
Lastly, the OECD also recommended the use of more than one transfer pricing method to corroborate the arm’s length

**transfer pricing amid covid-19**
Abigail Blanco Vázquez and Mario Ortega, J&A Garrigues, S.L.P., discuss the Spanish tax agency’s January 31 publication of the general guidelines of the 2022 Annual Tax and Customs Control Plan.

**spain’s annual guidelines on tax and customs controls focus on transfer pricing issues**
First, with the base erosion and profit-shifting project, the OECD updated rules for transfer pricing, hybrid entities, and harmful tax regimes, and it introduced the country-by-country reporting.

**pascal saint-amans: 10 years of oecd tax leadership**
The OECD Transfer Pricing Guidelines define a functional analysis as “an analysis aimed at identifying significant activities and responsibilities undertaken, assets used or contributed, and risks

**to object or take sars on review - that is the question**
will need to comply with transfer pricing rules and documentation requirements set with reference to the OECD Transfer Pricing Guidelines. A different tax rate for large multinationals that meet

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During transfer pricing proceedings The TPO went on to refer to the OECD report of 1979, OECD Guidelines, 2010, provisions of section 2(22)(e) of the Act and various other case laws. In view of

**ao not justified in re-characterising the transaction of issue of debentures/ccds as that of equity shares**
and a $2.43 favorable Comparable Net Package ADR impact driven by a favorable $1.1 million VAT adjustment to Comparable Owned Net Revenue following OECD guidelines for Transfer Pricing for

**playa hotels & resorts n.v. reports fourth quarter and full year 2021 results**
This element comes on top of the OECD Action 12 and do not respect EU or international transfer pricing guidelines. It should be expected that the mandatory disclosure of potentially

**tax transparency for tax advisers**
in reference to the regulations to be published and OECD transfer pricing guidelines. As of now, we do not see any exemptions for startups apart from taxable income of Dh375,000 that would not be

**uae 9% corporate tax one of the lowest in the world**
The Organisation for Economic Co-operation and Development (OECD)/G20 Global Anti-Base Erosion (GloBE, Pillar 2) Model Rules, published in December 2021, intend to address perceived challenges to

**an overview of oecd pillar 2**
The OECD began work on developing a new order domestic tax laws and transfer pricing regulations, application of carve-outs and carry-forward mechanisms and documentation.