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Toolkit for Transfer Pricing Risk Assessment in the African Mining Industry STRUCTURE OF THE TOOLKIT The toolkit is divided into four sections, mirroring the issues outlined above: marketing arrangements, intercompany debt, procurement services and management services. Each section begins with an information checklist that details all the

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Abstract: The African Tax Administration Forum (ATAF) and the German Federal Ministry for Economic Cooperation and Development (BMZ), through the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH, have developed this toolkit for African tax authorities seeking to assess transfer pricing risk in the mining industry. The purpose is to strengthen authorities' capacity to determine whether they should audit particular high-risk related party transactions.

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Toolkit for Transfer Pricing Risk Assessment in the ...

The Transfer Pricing Risk Assessment Tool is intended to be used primarily by tax authorities in resource-rich developing countries. It addresses the transfer mispricing challenge by offering user-friendly, step-by-step guidance on how to determine whether transactions in the extractive sector should be subject to transfer pricing audits.

New Publication: Toolkit for Transfer Pricing Risk ...

The ATAF and the German Federal Ministry for Economic Cooperation and Development have developed a toolkit for African tax authorities seeking to assess transfer pricing risk in the mining industry. The purpose is to strengthen the competent authorities' capacity to determine whether they should audit particular high-risk related party transactions.

Tax inSight: Transfer Pricing Risk Assessment Toolkit for ...

Toolkit For Transfer Pricing Risk Toolkit for Transfer Pricing Risk Assessment in the ... The toolkit employs a specific risk review approach, which focuses on particular transfer pricing issues that present a high risk to revenue (as distinct from a comprehensive risk review, which tax authorities use when they cannot detect where transfer ...

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This toolkit, in draft version, is intended to provide an analysis of policy options and a 'source book' of guidance and examples to assist low capacity countries in implementing efficient and effective transfer pricing documentation regimes.

TP Toolkit; a new guide | Strategizing Multinational Tax Risks

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Toolkit For Transfer Pricing Risk Assessment In The

A New Era In Transfer Pricing Risk Assessment. A toolkit for Transfer Pricing Risk Assessment in the African Mining Industry was launched in September this year by the African Tax Administration Forum (ATAF) at its International Conference on Tax in Africa (ICTA). This toolkit signals the next wave of intensified effort by tax administrations in Africa in the area of transfer pricing.

A New Era In Transfer Pricing Risk Assessment

1.1 Introduction: why a toolkit on implementing Transfer Pricing documentation? The relevance of transfer pricing to developing countries, together with the challenges faced by low-capacity or inexperienced tax administrations, has been high on the regional and global tax agenda in the last several years.

Practical toolkit to support the successful implementation ...

The toolkit, "Addressing Difficulties in Accessing Comparables Data for Transfer Pricing Analyses", specifically addresses the ways developing countries can overcome a lack of data needed to implement transfer pricing rules. This data is needed to determine whether the prices the enterprise uses accord with those which would be expected between independent parties.

The Platform for Collaboration on Tax delivers a toolkit ...

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Transfer Pricing Risk Assessment Toolkit for the Mining ...

The Transfer Pricing Examination Process (TPEP) supplants the Transfer Pricing Audit Roadmap (Roadmap), a 2014 toolkit designed to provide IRS examiners with audit techniques, advice, links and reference materials that may be helpful in planning, executing and resolving transfer pricing examinations.

US IRS publishes new guide on transfer pricing

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The toolkit is the first of its kind addressing mining. It aims to assist African tax authorities to determine whether particular high-risk related party transactions should be selected for transfer pricing audit. The toolkit is complementary to and supplements the ATAF Transfer Pricing Risk Assessment Tool, which applies to all sectors.

New Toolkit Aims to Curb Transfer Mispricing in African ...

The purpose of introducing the new transfer pricing risk assessment tool is to provide tax authorities with quick and transparent information on transfer pricing. However, the simplifications

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proposed will probably cause plenty of misunderstanding and the necessity to provide further explanation in a separate form or in transfer pricing documentation on ad hoc basis.

Poland issues controversial transfer pricing risk ...

The new Poland transfer pricing risk assessment tool requires taxpayers to include general information about the taxpayer, including financial indicators concerning financial conditions (operational margin, gross profit margin, return on assets, return on capital). Specific formulas are provided to calculate these indicators.

New Poland transfer pricing risk assessment tool released ...

Toolkit for Transfer Pricing Risk Assessment in the African Mining Industry Alexandra Readhead The African Tax Administration Forum (ATAF) and the German Federal Ministry for Economic Cooperation and Development (BMZ), through the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH, have developed this toolkit for African tax authorities seeking to assess transfer pricing risk ...

The cross-border transaction flows are increasingly being scrutinized mainly because in the present times of fiscal constraints, the tax administrations attempt to secure a wider revenue base. The dynamics of changing business structures and regulatory regimes make the analysis of transfer pricing more challenging for the taxpayers and the tax authorities. In India, there is a growing corpus of case laws on transfer pricing. This book covers the discussion on journey of Transfer Pricing from history to Future.

This report addresses the practical administration of transfer pricing programmes by tax administrations.

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Recent years have seen unprecedented public scrutiny over the tax practices of Multinational Enterprise (MNE) groups. Tax policy and administration concerning international transactions, aggressive tax planning, and tax avoidance have become an issue of extensive national and international debate in developed and developing countries alike. Within this context, transfer pricing, historically a subject of limited specialist interest, has attained name recognition amongst a broader global audience that is concerned with equitable fiscal policy and sustainable development. Abusive transfer pricing practices are considered to pose major risk to the direct tax base of many countries and developing countries are particularly vulnerable because corporate tax tends to account for a larger share of their revenue. This handbook is part of the wider WBG engagement in supporting countries with Domestic Resource Mobilization (DRM) by protecting their tax base and aims to cover all relevant aspects that have to be considered when introducing or strengthening transfer pricing regimes. The handbook provides guidance on analytical steps that can be taken to understand a country's potential exposure to inappropriate transfer pricing (transfer mispricing) and outlines the main areas that require attention in the design and implementation of transfer pricing regimes. A discussion of relevant aspects of the legislative process, including the formulation of a transfer pricing policy, and the role and content of administrative guidance, is combined with the presentation of country examples on the practical application and implementation of the arm's length principle and on running an effective transfer pricing audit program. Recognizing the importance of transfer pricing regulation and administration for the business environment and investor confidence, this handbook aims to balance the general objective of protecting a country's tax base and raising additional revenue with investment climate considerations wherever appropriate.

Intensive work on transfer pricing, one of the most relevant and

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challenging topics in the international tax environment, continues to increase worldwide at every level of government and international policy with far-reaching impact on countries' legislations, administrative guidelines, and jurisprudence. This book presents an in-depth, issue-by-issue analysis of the current state of developments along with suggestions for future solutions to the problems raised. Emerging from the research conducted by the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law at WU (Vienna University of Economics and Business), this book offers seven topic-based papers prepared by international experts on transfer pricing. Greatly helping to define where the line should be drawn to distinguish genuine transfer pricing issues from other anti-avoidance measures, this book encompasses the following topics: □ global transfer pricing developments; □ transfer pricing developments in the European Union; □ transfer pricing developments in the United States; □ transfer pricing developments in developing countries and emerging economies; □ recent developments on transfer pricing documentation and country-by-country reporting; □ recent developments on comparability analysis in transfer pricing; and □ recent developments on the profit split method. The intense work of international organizations such as the OECD, UN, EU, World Customs Organization, World Bank, International Monetary Fund, and other international organizations is thoroughly analyzed in this book. The detailed analysis will be of immeasurable value to the various players including international organizations, the business community and advisory firms, corporate CEOs and CFOs, and government officials as well as to tax lawyers, in-house counsel, and interested academics in facilitating an efficient dialogue and coordinated approach to transfer pricing in the future.

This publication is a response to the need, often expressed by developing countries, for clearer guidance on the policy and administrative aspects of applying transfer pricing analysis to some

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of the transactions of multinational enterprises (MNEs) in particular. Such guidance should not only assist policy makers and administrators in dealing with complex transfer pricing issues, but should also assist taxpayers in their dealings with tax administrations. Without an effective response to transfer pricing issues, profits earned in one jurisdiction might appear to be shifted to another jurisdiction. This may have the net effect of minimising tax revenues in a country where economic activity of the MNE takes place, and therefore the ability to finance country's development.

This consolidated version of the OECD Transfer Pricing Guidelines includes the revised guidance on safe harbours adopted in 2013, as well as the recent amendments made by the Reports on Actions 8-10 and 13 of the BEPS Actions Plan and conforming changes to Chapter IX.

Derived from the renowned multi-volume International Encyclopaedia of Laws, this book describes the social security regime in Slovenia. It conveys a clear working knowledge of the legal mechanics affecting health care, employment injuries and occupational diseases, incapacity to work, pensions, survivors' benefits, unemployment benefits and services, and family benefits. The analysis covers the field of application, conditions for entitlement, calculation of benefits, financing, the institutional framework, and relevant law enforcement and controls. Allowances for retirees, employees, public sector workers, the self-employed, and the handicapped are all clearly explained, along with full details of claims, adjudication procedures, and appeals. Succinct yet eminently practical, the book will be a valuable resource for lawyers handling social security matters in Slovenia. It will be of practical utility to those both in public service and private practice called on to develop and to apply social security law and policy, and of special interest as a contribution to the comparative study of

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social security systems.

The book examines the fundamental principles of risk-based audits, the institutional challenges, and analytical techniques used in risk-based audit strategies. It discusses development of databases and IT infrastructure critical for effective use of risk management techniques.

Step-by-step guidance on creating internal controls to manage risk

Internal control is a process for assuring achievement of an organization's objectives in operational effectiveness and efficiency, reliable financial reporting, and compliance with laws, regulations, and policies. This is a "toolkit" approach that addresses a practical need for a series of standards of internal controls that can be used to mitigate risk within any size organization. Inadequate internal controls can cause a myriad of problems that adversely affect its ability to provide reliable, timely, and useful financial and managerial data needed to support operating, budgeting, and policy decisions. Reliable data is necessary to make sound business decisions. □ Toolkit approach with detailed controls and risks outlined for key business processes □ Foundational for SOX 404 initiatives □ Key material to improve internal control efforts □ Guidance during M&A projects Poor controls over data quality can cause financial data to be unreliable, incomplete, and inaccurate□this book helps you control that quality and manage risk.

Step-by-step guidance on creating internal controls to manage risk

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