

Background Paper

Working Draft

Chapter 1

An Introduction to Transfer Pricing

[This paper is essentially a paper prepared by Members of the UN Tax Committee's Subcommittee on Practical Transfer Pricing Issues, but includes some Secretariat drafting and suggestions not yet considered by them – the Secretariat takes responsibility for any relevant errors and omissions.]

Table of Contents

Section No.	Title	Page Number

1. What is Transfer Pricing?

.....

.....
.....
.....

.....
.....
.....

.....

way

(2) Functional analysis (Functions, Assets and Risks)

...

...

... r ... f ... a ...

...

§

§

§

§

§

§

§

§

§

§

form

substance

prices

margins

(b) Transaction analysis

undertaken *actually*

(c) Evaluation of separate and combined transactions

.....
.....
.....
.....

.....
.....
.....

(d) Use of an arm's length range

.....

.....

5. Transfer Pricing Methods

(a) Profit comparison methods (TNMM/CPM)

.....
.....
.....
.....

(b) Profit split methods ("PSM")

.....
.....
.....
.....

(ii) Transfer pricing and the Model Conventions

8. Transfer Pricing in Domestic Law

(i) Introduction

$.D - .0002 T_c (\text{arm's})T_j / T$

favourable

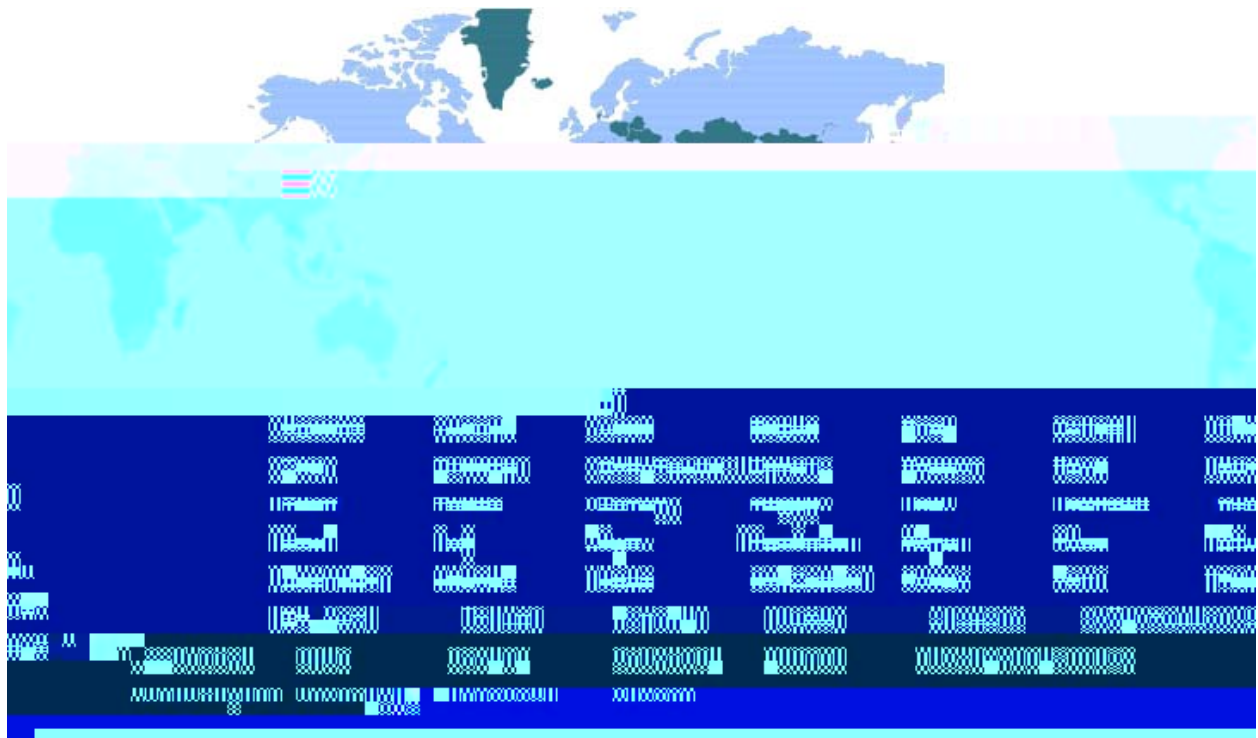
(iii) Controlled Foreign Corporation provisions

(v) **Documentation**

noted,

.....

9. Global Transfer Pricing Regimes



10. Transfer Pricing as a

(b) Lack of knowledge and requisite skill sets

(c) Complexity

.....

11. Summary and Conclusions