

Preface



The subject of transfer pricing has been evolving since its inception with simple legislation of transfer pricing being notified in the year 2002 to CBCR and Master File compliances being notified in Budget 2016.

The active Indian support towards implementation of OECD's BEPS project has led to needs of greater transparency in the transfer pricing documentation and reporting, with focus on substance rather than form, accordingly there is a need for robust transfer pricing documentation and reporting at the taxpayers end, which this book enables the tax payers to perform in an efficient and effective manner.

This books deals with various transfer pricing documentations such as transfer pricing agreement, transfer pricing policy, local file, master file, CBCR and various reporting forms for such documentations prescribed by the Indian TP legislation.

The authors have followed a practical case study based approach with case studies ranging from transfer pricing policy, transfer pricing agreement to practical application of Benchmarking, planning and local file. The book also includes checklist and case study for Form 3CEB.

This book will help small and large tax payers to prepare effective and robust transfer pricing documentation ensuring compliance with existing transfer pricing legislation in India. The robust transfer pricing documentation will go long way in avoiding or even defending any transfer pricing related disputes with tax authorities.

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We look forward to the feedback of readers over email to help us to make this book better and effective for taxpayers.

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