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OESO-richtlijnen Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations. OESO Organisatie voor Economische Samenwerking en Ontwikkeling. Voor zover de term functie(s) wordt gebruikt, zal hiermee worden bedoeld: functie(s), rekening houdend met de gebruikte activa en de gelopen risico’s.

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in the 2017 edition of the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations (OECD TPG), in particular the accurate delineation analysis under Chapter I, to financial transactions. The Report represents the first time that guidance on financial transactions is included in

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Transfer pricing - Wikipedia

Transfer pricing in de Nederlandse wetgeving. In Nederland zijn de bepalingen rond het at arms lengths beginsel en Transfer pricing geregeld in de Wet op de vennootschapsbelasting 1969 (VPB).. Artikel 8b VPB regelt hoe een onderneming zijn winst moet bepalen indien deze handelt met ondernemingen die binnen dezelfde groep vallen.

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Executive summary On 10 July 2017, the Organisation for Economic Co-operation and Development (OECD) released the 2017 edition of the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations (OECD TPG) in English and French.

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