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The EY Worldwide Transfer Pricing Reference Guide 2019-20 is a publication designed to help international tax executives identify transfer pricing rules, practices and approaches. These must be understood for a company to carry out both transfer pricing compliance and planning activi-

ties in the base erosion and profit shifting (BEPS)¹ era.

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OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations 2017 DOI:

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This consolidated version of the OECD Transfer Pricing Guidelines includes the revised guidance on safe harbours adopted

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