



# Insights: Transfer Pricing

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October 2015

## BEPS: What lies within your country-by-country transfer pricing

On October 5, 2015, the OECD released its package of final reports under the OECD/G20 Base Erosion and Profit-Shifting Project (BEPS). Action 13 of the BEPS Action Plan contains the OECD's new guidance on a standardized three-tiered approach to transfer pricing documentation and introduces a requirement for large multinational enterprises (MNEs) to provide governments with information on their global allocation of income, economic activity, and taxes paid among countries according to a common template—the Country-by-Country Report (CbC Report). In light of the new CbC Report, CRA has developed a proprietary diagnostic tool that uses CbC data to provide insight into a company's global transfer pricing position, based on BEPS concepts of value creation and risk alignment. To read more, click [here](#).

## Events

### **BKR International EMEA/AsiaPac Regions - Charles River Associates Webinar**

October 21, 2015

[Paul Wilmshurst](#) and [Gerben Weistra](#) presented on “Transfer Pricing: Developing Opportunities” at this webinar hosted by BKR international EMEA and AsiaPac Regions. The webinar covered hot topics in transfer pricing such as base erosion and profit shifting (BEPS) and issues to look out for. For more information, click [here](#).

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