

Chapter10 CountryPractices

10.1. Preambleby the Subcommitteeon TransferPricing– PracticalAspects

10.1.1 In the first nine Chapters of this Manual, the Subcommittee has sought to provide practical guidance on the application of transfer pricing rules based on Article 9(1) of the UN Model Tax Convention and the arm's length principle embodied in that Article. With regard to Chapters 1 through 9, the Subcommittee has discussed and debated the merits of the guidance that is provided and, while there may be some disagreement on certain points, for the most part the Subcommittee is in agreement that the guidance in those chapters reflects emerging economies, struggle at times with the details of applying these treaty based principles in a wide variety of practical

situations. It therefore seemed appropriate to allow representatives of individual countries an opportunity to set out their individual country viewpoints and experiences for the information of readers. Those individual country views are contained in this Chapter 10. It should be emphasized that Chapter 10 does not reflect a consistent or consensus view of the Subcommittee.