



A useful book for practising CAs

— Mr. Sunil Talati

A book on **Transfer Pricing**, which can be of day-to-day help and assistance to practising Chartered Accountants, particularly those, who are not exposed to the intricacies of these newly enacted provisions, was very much necessary. Shri V.S. Wahi, B.Com., LL.B. M.B.A., M.Phil. has exhibited excellent efforts in incorporating various provisions of Transfer Pricing in this novel book. Transfer pricing in India has taken a definite shape with enactment of a comprehensive legislation, which are fairly comprehensive and follow the internationally accepted principles of computing income from international transactions at arm's length prices.

The author has divided this book into 17 Chapters followed by Appendices. Starting from the concept of Transfer pricing, development in India, the author has dealt with in great detail as to what is 'Associated Enterprises' and what is 'Arm's length price'. Thereafter, the Author has dealt with what are 'Traditional Transaction Methods' and what are 'Transactional Profit Methods'. Subsequent Chapters covered are Transfer Pricing of Intangibles, Transfer Pricing Compliance & Procedures and Documentation covering OECD Guidelines, approach of other countries and Indian Rules. In Chapter-10 the author has dealt with Associated Enterprises Transactions under Tax Treaties dealing at length with Article 9 on Model Convention. The book thereafter deals with Disputes Resolution and Penalties in a quite fair and descriptive manner.

Chapter-13 covers Electronic Commerce and Transfer Pricing and Chapter-14 deals with Transfer Pricing Under Central Excise & Customs Law, which are really useful to the readers while dealing the same in actual practice. The author thereafter has dealt with at length OECD guidelines, global perspective of transfer pricing regulations and also regulations in other coun-

tries, covering about 19 countries to whom provisions of Transfer Pricing are applicable.

The author at the end has dealt with 'Special Provisions' relating to 'Avoidance of Tax' i.e. Section 92 to 92F of Income Tax Act, Transfer Pricing Rules, matters pertaining to be submitted in Form 3CEB by Chartered Accountants under Sec. 92E relating to International Transactions and thereafter covering various other Rules and Circulars and also Documentation required in different countries, Indian Tax Treaties. The statistics given in Indian database and Foreign database would also come handy to the readers.

Authored by a Senior Departmental Officer of Indian Revenue Service with a rich and diverse experience in this field, it has come out very well as a good comprehensive book covering almost all major aspects of Transfer Pricing.

(The reviewer is a Central Council Member of the Institute. He can be reached at suniltca@hotmail.com)

Off-Campus Interviews for the recruitment of newly qualified Chartered Accountants

The Committee for Members in Industry has successfully conducted the Campus Interviews for the newly qualified Chartered Accountants during the month of February 2005. The facility was availed by 53 organisations with 81 interview panels. The Committee also organises off-campus Interviews for organisations (including CA firms) intending to recruit newly qualified Chartered Accountants. Depending upon the requirements, these off-campus Interviews could be conducted at the premises of the Institute at ten centres all over India. Intending recruiters may please visit www.placements-icai.org.

There is also a facility to get the details of the candidates (campus interviews center wise) to enable various organisations (including CA firms) to meet their personnel requirements. In this case the interviews are required to be conducted at the premises of the organisations concerned.

For further queries / clarifications relating to the above services please get in touch with the Chairman or Secretary to the Committee for Members in Industry of the Institute. (Phone - 011 - 23378310 / 23370055 Extn. 450 / 442, Fax: 011 - 23379610 E-mail: placements@icai.org)

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