

## Arm's Length Standard Global views within reach.



**Welcome to the final edition of *Arm's Length Standard* – Subscribe to *World Tax Advisor* to continue receiving transfer pricing updates**

*Arm's Length Standard* is merging with *World Tax Advisor*, presenting tax news, commentary and insights from around the world, including a monthly tax treaty update, written by professionals of the member firms of Deloitte and focusing on analyses of cross-border tax developments that reflect the dynamic business environment faced by multinationals. This weekly newsletter links readers directly to top stories reported on Deloitte tax@hand, Deloitte's global tax news and information resource for tax and business professionals. [Subscribe now](#) to receive *World Tax Advisor* directly via email.



### Global

#### **Third phase of peer reviews released on CbC reporting**

On 24 September 2020, the OECD issued a news release announcing the issuance of the third phase of peer reviews relating to the BEPS Action 13 country-by-country (CbC) reporting initiative.



### European Union

#### **EU Commission to appeal General Court's ruling in Irish state aid case**

The European Commission announced that it will appeal to the Court of Justice of the European Union (CJEU) the General Court's judgment of 15 July 2020 on the Apple state aid case in Ireland.



## Hong Kong

### **Tax authorities commence transfer pricing documentation compliance reviews**

In September 2020 the Hong Kong Inland Revenue Department began the first round of compliance reviews on taxpayers' transfer pricing documentation with requests for information.



## Chile

### **Master file and local file requirements published**

Exempt Resolution No. 101 establishes the obligations for companies to file an annual master file and local file.



## United States

### **Transfer pricing: How inbound companies can recover and thrive during COVID-19**

In this article, we highlight some key transfer pricing considerations related to the potential impact of COVID-19 on foreign-based multinational enterprises operating in the US.



## India

### **Detailed guidance on mutual agreement procedure issued**

India's Central Board of Direct taxes issued detailed guidance on the regulations and processes that the Indian government intends to follow when implementing the mutual agreement procedure.



## Global

### **ITR Special Focus – Transfer Pricing Controversy (3rd edition)**

We are proud to partner with ITR for the 3rd edition of the Transfer Pricing Controversy guide, featuring 10 articles that bring you exclusive insight into how transfer pricing controversy is evolving as global



## Global

### **ITR Special Focus – Transfer Pricing Financial Services (1st edition)**

In collaboration with ITR, Deloitte brings you the key themes that global tax and transfer pricing experts should consider as they confront the new reality facing the financial services sector.

businesses go through a transformative phase in 2020.

### Have you visited Deloitte tax@hand?

Tax reform. Unprecedented change. Unique challenges. This is the future of tax. How can you stay ahead? Understand what changes are unfolding in the global tax landscape. Be informed so that you can turn change into opportunity. For the latest tax news and information from over 80 countries, [visit](#) tax@hand or [download](#) the tax@hand mobile app today.

### Helpful Resources

[Subscribe to Arm's Length Standard](#)

[Arm's Length Standard archives](#)

[Visit Deloitte.com](#)

[US Transfer Pricing](#)

[Read Accounting for Income Taxes](#)

[Join Dbriefs](#)

[Follow us on Twitter](#)

### Have a question?

If you have needs specifically related to this newsletter's content, [send us an email](#) to have a Deloitte Tax professional contact you.

Did someone forward you this message? Skip the grapevine. Receive this newsletter email by clicking on the [subscribe](#) link above to hear it first.

[Deloitte.com](#) | [Legal](#) | [Privacy](#)

30 Rockefeller Plaza  
New York, NY 10112-0015  
United States

© 2020. For information, contact Deloitte Touche Tohmatsu Limited.



## **About Deloitte**

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms, and their related entities (collectively, the “Deloitte organization”). DTTL (also referred to as “Deloitte Global”) and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see [www.deloitte.com/about](http://www.deloitte.com/about) to learn more.

Deloitte is a leading global provider of audit and assurance, consulting, financial advisory, risk advisory, tax and related services. Our global network of member firms and related entities in more than 150 countries and territories (collectively, the “Deloitte organization”) serves four out of five Fortune Global 500® companies. Learn how Deloitte’s approximately 312,000 people make an impact that matters at [www.deloitte.com](http://www.deloitte.com).

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited (“DTTL”), its global network of member firms or their related entities (collectively, the “Deloitte organization”) is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.