Many countries and international organizations are following the OECD's lead in introducing legislation to combat the practices of multinational enterprises (MNEs) that result in understated taxable profits through aggressive transfer pricing, which can lead to a tax rate differential between jurisdictions. In jurisdictions where transfer pricing is not yet in place, or is not as developed as in other countries, the guidelines provide practical assistance in understanding how to implement adequate transfer pricing rules. They also provide practical assistance in interpreting current transfer pricing rules, and include a comprehensive glossary. The guidelines are designed to provide a common baseline for international tax administration and will help ensure that transfer pricing rules are applied consistently. They also provide a useful tool for taxpayers and their advisors in understanding and applying current transfer pricing rules. The guidelines are intended to help ensure that the transfer pricing rules of a country are applied consistently and in a manner that is in line with the international consensus. They also provide a useful tool for taxpayers and their advisors in understanding and applying current transfer pricing rules. The guidelines are intended to help ensure that the transfer pricing rules of a country are applied consistently and in a manner that is in line with the international consensus. They also provide a useful tool for taxpayers and their advisors in understanding and applying current transfer pricing rules. The guidelines are intended to help ensure that the transfer pricing rules of a country are applied consistently and in a manner that is in line with the international consensus. They also provide a useful tool for taxpayers and their advisors in understanding and applying current transfer pricing rules.