

# Global Transfer Pricing

With a rise in cross-border transactions between group companies and stringent norms being imposed by governments across the globe, transfer pricing has one of the biggest tax risks. In addition, recent changes by the Organisation for Economic Co-operation and Development (OECD) in the area of Base Erosion and Profit Shifting (BEPS) have made it imperative for companies to find an efficient yet legally acceptable transfer pricing solution.



Our transfer pricing team offers a full range of transfer pricing services, independent advice, and global solutions for MNEs.

**? We can help answer the most important questions**

Do we have a **global pricing policy** in place for all your related party transactions?

Is the pricing policy **tax efficient** and **compatible with operating structure and business strategies** of the group?

Are we **effectively managing annual transfer pricing compliances** at a group level and a country level?

Is the **documentation robust** enough to demonstrate and defend positions?

Are we availing transfer pricing consultancy and compliance services in a **cost-efficient manner**?

## Our Services



Devising Global Transfer Pricing Policies



Tax-efficient Supply Chain Management



BEPS Advisory



Country Specific Documentation & Annual Compliances



Valuation & Advisory Services

## Our Credentials

### ★ Middle East-Based Shipping Group

Advised in revising the pricing policy for their subsidiary from a commission basis to a cost-plus basis, resulting in significant tax savings.

### ★ Paint Manufacturing Company

Advised in devising global transfer pricing policies for the company and its 23 subsidiaries across the globe, especially regarding license fees and management charges.

### ★ French Cosmetic Company

Assisted in defending its Advertisement, Marketing and Promotional expenses and achieving favorable results during the audit process before the tax authorities.

### ★ US-Based Nonprofit Organization

Assisted in negotiating the terms of unilateral APA with respect to remunerating the subsidiary for its investment advisory services, thereby saving nearly one-third of the tax costs for the group.

### ★ Leading Singaporean HR Consulting Group

Advised in devising a tax-efficient transfer pricing policy for the companies related party dealings across the Asia-Pacific region.

### ★ One of the Largest French Chemicals Manufacturer

Assisted in preparing the group master file of the company and its 50+ subsidiaries across the globe.