

# Standing out from the competition

About the PricewaterhouseCoopers'  
global Transfer Pricing network

The use of transfer pricing tax strategies has recently attracted a high level of international attention, due in part to the rapid rise of multinational trade, the opening of several significant developing economies such as China, India, Brazil and Russia, and transfer pricing's increased impact on corporate income taxation. As multinational corporations evolve into true global enterprises—whose business strategies, supply chains, intellectual property and technology are no longer organised around international and regional boundaries—compliance with the differing requirements of multiple overlapping tax jurisdictions has become a complicated and expensive task.

In response to these factors, tax authorities around the world have become more aggressive in the transfer pricing arena, introducing stricter penalties, new documentation requirements, increased information exchange, improved audit staff training and increased audit and inspection activity and specialisation.

This intense scrutiny implies significant risks for the unwary and the unprepared, particularly in a complex field such as transfer pricing, where each transaction must be analysed under its own unique facts and circumstances. As a result, tax practitioners are making use of careful advance planning and comprehensive documentation and compliance practices to decrease their exposure to these inherent risks.

At PricewaterhouseCoopers, we view these developments through the eyes of a firm that has maintained a dedicated global Transfer Pricing network for over 20 years and with the focus on quality that you would expect from the world's largest professional services firm. Our network consists of more than 100 partners and 1,600 dedicated transfer pricing professionals based in over 70 countries.

Our professionals work together on every engagement, drawing on a global resource pool to identify the appropriate team for each project. This allows us to deliver seamless services covering a wide range of intercompany transactions in the Americas, Europe, and Asia Pacific, including global transfer pricing planning and documentation studies, audit defence, advance pricing agreement services and other global dispute techniques.

The Global Tax Monitor<sup>1</sup> recognises PricewaterhouseCoopers as the leading firm globally for transfer pricing, by reputation, with a very strong lead over the competition. These results are based on the year-ending Q2 2009 figures, with a sample size of 3,246 primary buyers of tax services globally.

<sup>1</sup> Launched in 2000, the Global Tax Monitor (GTM) is a multi-client independent survey conducted by research agency TNS, that examines the competitive position of the top firms in the tax advisory market - globally, regionally, nationally and on an industry basis. It provides a comprehensive measure of firm reputation, client service and brand health, gained currently from just over 3,000 telephone interviews annually with key decision makers (CFOs and Tax Directors) in 31 key markets.

## Transfer pricing services

At PricewaterhouseCoopers, we help our clients manage transfer pricing risks and provide opportunities for improving the sustainable tax efficiency of their business.

Our combined experience enables us to develop innovative approaches for an expansive list of clients, from high growth entrepreneurs to established market leaders, in a wide range of industries. We focus on providing our clients with:

- Innovative [planning](#) ideas
- A broad range of [documentation](#) options
- [Controversy resolution](#) capabilities
- Supporting [transfer pricing tools](#)
- Access to our [global network](#)
- Fast and insightful updates on [legislative and regulatory developments](#)

With the ever-increasing scrutiny of transfer pricing activity by tax authorities worldwide, PricewaterhouseCoopers strives to assist our clients in the development of tax-efficient structures that help them increase compliance with legal requirements, prepare for rapid audit response, resolve transfer pricing disputes and decrease transfer pricing exposure in future periods.

PricewaterhouseCoopers' transfer pricing professionals have recently assisted clients with the following:

- Developing coordinated, centralised global documentation and defence processes which incorporate the requirements of each jurisdiction;
- Transfer pricing planning studies;
- Evaluating transfer pricing risks;
- Drafting economic and industry studies;
- Negotiating Advance Pricing Agreements (APAs);
- Developing sales and marketing organisations to centrally control and manage sales to third parties, as well as the accompanying risks;
- Benchmarking fees related to licensing of intangible assets & royalties;
- Global dispute resolution and Competent Authority negotiations;
- Performing due diligence functions;
- Providing expert testimony and litigation support in many countries where our clients operate; and
- Assessing potential benefits and risks inherent in existing global operations;
- Value Chain Transformation (VCT);
- Transfer pricing analyses;
- Evaluation of reserves necessary for uncertain tax positions (e.g., FIN48).

In addition to these services, PricewaterhouseCoopers' global Transfer Pricing network offers customised tools and thought leadership, such as:

- The [Pricing Knowledge Network \(PKN\)](#), a free subscription-based e-mail newsletter which provides instant transfer pricing alerts and analysis of major intercompany pricing issues and related developments from around the world;
- TP3, an Internet-based electronic workroom which allows PwC Transfer Pricing professionals to share project-specific data with our clients;
- [Periodic Transfer Pricing Masters Series](#), intensive client seminars that focus on the transfer pricing issues related to specific industries or geographies;
- [Transfer Pricing Perspectives](#), a quarterly compilation of articles covering key issues of interest to transfer pricing professionals.

## Key global contacts:

### Global transfer pricing leader

Garry Stone  
PricewaterhouseCoopers (US)  
garry.stone@us.pwc.com  
+1 312 298 2464

### Americas

Horacio Peña  
PricewaterhouseCoopers (US)  
horacio.pena@us.pwc.com  
+1 646 471 1957

### Europe

Isabel Verlinden  
PricewaterhouseCoopers (Belgium)  
isabel.verlinden@be.pwc.com  
+32 2 710 4422

### CEE

Ionut Simion  
PricewaterhouseCoopers (Romania)  
ionut.simion@ro.pwc.com  
+40 21 202 8702

Zaid Sethi  
PricewaterhouseCoopers (Hungary)  
zaid.sethi@hu.pwc.com  
+36 1 461 9289

### Asia Pacific

Peter Calleja  
PricewaterhouseCoopers (Australia)  
pete.calleja@au.pwc.com  
+61 2 8266 8837

### Global Dispute Resolution

David Swenson  
PricewaterhouseCoopers (US)  
david.swenson@us.pwc.com  
+1 202 414 4650

## Key industry contacts:

### Financial Services leader

Adam Katz  
PricewaterhouseCoopers (US)  
adam.katz@us.pwc.com  
+1 646 471 3215

### Banking & Capital Markets

Annie Devoy  
PricewaterhouseCoopers (UK)  
annie.e.devoy@uk.pwc.com  
+44 20 7212 5572

### Insurance

Junko Yamato  
PricewaterhouseCoopers (Japan)  
junko.yamato@jp.pwc.com  
+81 3 5251 6736

### Investment Management

Aamer Rafiq  
PricewaterhouseCoopers (UK)  
aamer.rafiq@uk.pwc.com  
+44 20 7212 8830

### Real Estate

Michel van der Breggen  
PricewaterhouseCoopers  
(The Netherlands)  
michel.van.der.breggen@nl.pwc.com  
+31 2 0568 6160

### Consumer, Industrial Products leader

Anthony Curtis  
PricewaterhouseCoopers (US)  
anthony.curtis@us.pwc.com  
+1 646 471 0700

### Automotive

Loek de Preter  
PricewaterhouseCoopers (Germany)  
loek.de.preter@de.pwc.com  
+49 69 9585 5735

### Retail & Consumer Goods

Sue Rissbrook  
PricewaterhouseCoopers (UK)  
sue.rissbrook@uk.pwc.com  
+44 121 265 5294

### Energy, Utilities and Mining

Dale Bond  
PricewaterhouseCoopers (US)  
dale.bond@us.pwc.com  
+1 713 356 4156

### Industrial Products

Geoffrey Armstrong  
PricewaterhouseCoopers (US)  
geoffrey.k.armstrong@us.pwc.com  
+1 267 330 5374

### Pharmaceutical

Horacio Peña  
PricewaterhouseCoopers (US)  
horacio.pena@us.pwc.com  
+1 646 471 1957

### Technology, Infocomms, Entertainment & Media leader

Andrew Casley  
PricewaterhouseCoopers (UK)  
andrew.casley@uk.pwc.com  
+44 20 7213 3685

### Entertainment & Media

Paige Hill  
PricewaterhouseCoopers (US)  
paige.hill@us.pwc.com  
+1 646 471 5192

### Technology

Marios Karayannis  
PricewaterhouseCoopers (US)  
marios.karayannis@us.pwc.com  
+1 408 817 7456

### InfoComms

W. Joe Murphy  
PricewaterhouseCoopers (US)  
w.joe.murphy@us.pwc.com  
+1 703 918 3518

[pwc.com/transferpricing](http://pwc.com/transferpricing)

PricewaterhouseCoopers provides industry-focused assurance, tax, and advisory services to build public trust and enhance value for its clients and their stakeholders. More than 155,000 people in 153 countries across our network share their thinking, experience and solutions to develop fresh perspectives and practical advice.

© 2009 PricewaterhouseCoopers. All rights reserved. 'PricewaterhouseCoopers' refers to the network of member firms of PricewaterhouseCoopers International Limited, each of which is a separate and independent legal entity.

Design Services 24098 (09/09).