

Tax Services

# Standing out from the competition\*

PricewaterhouseCoopers'  
Global Transfer Pricing Group

\*connectedthinking

PRICEWATERHOUSECOOPERS 

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 organized 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 specialization.

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 analyzed 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 practice for over 20 years and with the focus on quality that you would expect from the world's largest professional services firm. Our Global Transfer Pricing group consists of more than 100 partners and 1500 dedicated transfer pricing professionals based in over 50 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 defense, advance pricing agreement services and other global dispute techniques.

The Global Tax Monitor, an independent global study conducted by research agency TNS, recognizes PricewaterhouseCoopers as having the strongest overall reputation globally for transfer pricing, litigation and investigation, with a very strong lead over the competition.<sup>1</sup>

<sup>1</sup>survey conducted by TNS (Taylor Nelson Sofres plc), these results are based on the year-ending Q4 2008 figures, with a sample size of 3,168 primary buyers of tax services globally.

## 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, centralized global documentation and defense processes which incorporate the requirements of each jurisdiction;
- Evaluating transfer pricing risks;
- Drafting economic and industry studies;
- Negotiating Advance Pricing Agreements (APAs);
- Developing sales and marketing organizations 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.

In addition to these services, PricewaterhouseCoopers' global transfer pricing network offers customized 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 Leader

Garry Stone  
garry.stone@us.pwc.com  
+1.312.298.2464

### Americas

Horacio Peña  
horacio.pena@us.pwc.com  
+1.646.471.1957

### Europe

Isabel Verlinden  
isabel.verlinden@be.pwc.com  
+32.2.710.44.22

### CEE

Ionut Simion  
ionut.simion@ro.pwc.com  
+40 21 202 8702

Zaid Sethi  
zaid.sethi@hu.pwc.com  
+36 1 461 9289

### Asia Pacific

Peter Calleja  
pete.calleja@au.pwc.com  
+61 2 8266 8837

### Global Dispute Resolution

David Swenson  
david.swenson@us.pwc.com  
+1.202.414.4650

## Key industry contacts:

### Financial Services Leader

Adam Katz  
adam.katz@us.pwc.com  
+1.646.471.3215

### Banking & Capital Markets

Annie Devoy  
annie.e.devoy@uk.pwc.com  
+44.207.212.5572

### Insurance

Junko Yamato  
junko.yamato@us.pwc.com  
+1.646.471.1432

### Investment Management

Aamer Rafiq  
aamer.rafiq@uk.pwc.com  
+44.20.721.28830

### Real Estate

Michel van der Breggen  
michel.van.der.breggen@nl.pwc.com  
+31.2056.86160

### Consumer, Industrial Products Leader

Anthony Curtis  
Anthony.curtis.us.pwc.com  
+1 646 471 0700

### Automotive

Loek de Preter  
loek.de.preter@de.pwc.com  
+49.69.9585.5735

### Retail & Consumer Goods

Sue Rissbrook  
sue.rissbrook@uk.pwc.com  
+44.121.265.5294

### Energy, Utilities and Mining

Dale Bond  
dale.bond@us.pwc.com  
+1.713.356.4156

### Industrial Products

Geoffrey Armstrong  
geoffrey.k.armstrong@us.pwc.com  
+1 267 330-5374

### Pharmaceutical

Horacio Peña  
horacio.pena@us.pwc.com  
+1.646.471.1957

### Technology, Infocomms, Entertainment & Media Leader

Andrew Casley  
andrew.casley@uk.pwc.com  
+44.20.721.33685

### Entertainment & Media

Paige Hill  
paige.hill@us.pwc.com  
+1.646.471.5192

### Technology

Marios Karayannis  
marios.karayannis@us.pwc.com  
+1.408.817.7456

### InfoComms

W. Joe Murphy  
w.joe.murphy@us.pwc.com  
+1.703.918.3518

For more information on  
PricewaterhouseCoopers'  
Transfer Pricing practice,  
please visit: [www.pwc.com/tp](http://www.pwc.com/tp)

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