Assistance in concluding an advance pricing agreement with the tax authority

It is increasingly common for multinational enterprises to enter into an advance pricing agreement (APA) with the tax authority that will determine the price of a transaction between related companies. Entering into an APA gives you certain advantages.

A key benefit is having confidence in your transfer prices and a sense of security that the tax authority will not audit the relevant transaction or type of transaction if you comply with all the agreed conditions.

You may conclude an APA not only for years ahead but also for the last five years to efficiently resolve a prolonged dispute you might have with the tax authority.

How we can help you:

- Preparing an APA application
- Determining an arm’s length price of a transaction or type of transaction
- Reviewing the legal form of your transactions
- Reviewing the legal form of your transactions

How you benefit:

- You have confidence in the transfer prices applied.
- You make a saving.
- You have an APA for past periods.
- You have confidence that the tax authority will not start a TP audit of the transaction covered by the APA.

Contacts

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