Representing you in negotiations with the tax authority

According to a memorandum signed by the government agencies and business associations in 2017 to implement the “Advise First” principle, the main obligation of supervisory authorities is to act as a trusted assistant and business partner to ensure companies are aware of and carry out their obligations conscientiously.

The tax authority is putting this principle into practice through the International Transactions Risk Prevention Unit of the Tax Compliance Promotion Board, which focuses on assessing whether controlled transactions are arm’s length.

You may sign up for advanced consultation and learn the tax authority’s opinion on the structure of your proposed transactions or to examine your transactions for compliance with TP requirements.

Contacts

PwC transfer pricing team

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How we can help you:

- Mediating between you and the tax authority as part of the advanced TP consultation
- Arranging and leading a meeting between you and the tax authority, including a remote one
- Presenting and defending your position in communication with the tax authority
- Staying in touch with the tax authority until you have their written advice

How you benefit:

- Your TP risks are assessed and prevented early.
- You feel certain about applying TP requirements to your financial data.
- You can build a cooperative relationship with the tax authority.