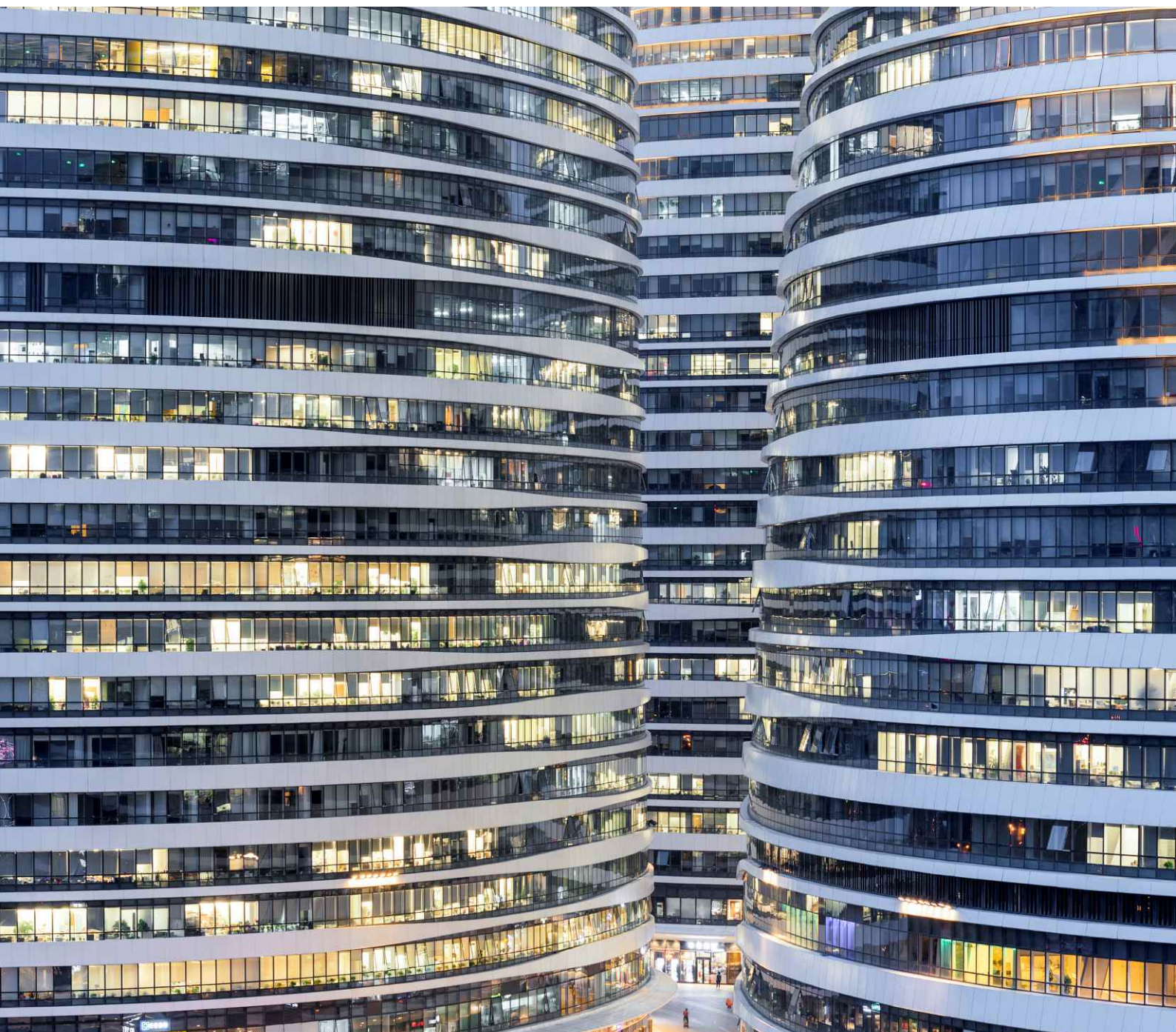




Managing your risks in the global economy with PwC team in Ukraine

Transfer pricing services



93

COUNTRIES

We are able to meet our clients' needs by combining our local expertise and knowledge with the strength of our global network

3100

HIGHLY QUALIFIED AND EXPERIENCED
TP SPECIALISTS

Avail yourself of
the opportunity to work with
20+ TP professionals in Ukraine,
who are on hand to kick-off
at any given point of time

Get more with our
Transfer pricing (TP)
team in Ukraine

I am Olga Trifonova, Head of Transfer
Pricing practice at PwC in Ukraine, and
my team and I are here to help you!

In an ever-changing global economy,
TP is one of the most important tax
issues for multinational companies.
With more than 3,000 professionals in
over 90 countries, PwC's TP network
of teams is well-positioned to advise
you on a strategy that can help
advance your goals within the ever-
shifting compliance landscape.

Our TP team in Ukraine comprised of 20+ experienced
professionals can help your business with being
compliant with TP regulations, managing TP risks and
finding opportunities for sustainable improvement to
your tax efficiency.

Let us show how!

Taking you
from complexity
to execution

 2000  companies
subject to TP

TP ADJUSTMENTS

bn
UAH 5.5



See, what we can do for you



TP policy
Planning and development;
TP methodology for
permanent establishments



**Development and
implementation of TP
business processes**



**Value chain analysis and
transformation**
Analysis and
transformation of
operational model,
transfer of functions, risks
and assets abroad;
structuring of operational
activities



Reporting and compliance
Assisting with preparation
of three-tiered TP
documentation (Country-
by-Country reporting,
Master file and Local file),
notification of participation
in Multinational Enterprise
Group, report on controlled
transaction



**Advance Pricing
Agreements (APA)**
Supporting during the
process of negotiations and
preparing the APA



TP audits and disputes
Helping our clients defend
position during TP audits
and win TP disputes in
courts



TP advice
Advice on different
TP matters



**Business purpose and
economic benefit test**
Assisting in substantiation
the economic benefit of
intragroup services and
intangible assets received



We have surveyed* our clients in order to find out what sets us aside and makes out offering unique

* 71 respondents, clients of TP practice at PwC in Ukraine during 2017-2019, polled

? Do you feel that you get more by working with TP team at PwC in Ukraine?



? What do you value most about partnering with us?**

**opportunity to provide several answers



The mere fact that our business works with PwC, is a stamp of approval of our business transparency & compliance and showing zero tolerance to controversial practices



PwC is a global company, which means we can get assistance in almost any country across a globe



Your team thinks in terms of our business KPIs



You value our time and plan your work accordingly, so we can spend our time on more important matters



You provide us with feeling of security with regard to being compliant

Now you have an opportunity to find out for yourself if we fit the above



Learn more how we can help you reach your business goals



Olga Trifonova
Director,
Head of Transfer
Pricing practice
olga.trifonova@pwc.com



Kateryna Kislitsyna
Manager
Kyiv office
kateryna.kislitsyna@pwc.com



Anna Nikolayko
Senior Manager
Kyiv office
anna.nikolayko@pwc.com



Taras Polianskyi
Manager
Lviv office
taras.polianskyi@pwc.com

Head office (Kyiv)
75 Zhylyanska st.
01032, Kyiv, Ukraine
+380 44 354 04 04

Lviv office
111a Shevchenko st.
79039, Lviv Ukraine
+380 32 236 2050

tp.pwc.ua

