

# Transfer pricing

## Optimising global tax and building a robust framework

International businesses are operating in a challenging environment, which is dominated by global tax reforms, supply chain changes, and increased complexity and uncertainty. It is therefore essential that your business has a clear view of the road ahead and the best way to navigate it. Evelyn Partners can help you build a transfer pricing framework that optimises your tax position, achieves scale in international markets, and mitigates your transfer pricing risk.

### International service delivery

We know how complex your international needs can be. Our approach connects the dots so you can rest easy while we take care of all your requirements. As a founding member of CLA Global, Evelyn Partners provides high quality, bespoke tax, audit and advisory services to clients across the globe. Our UK-based teams work closely with firms globally to source local advice or compliance support where required.

Our transfer pricing team works with businesses in all sectors and focuses on the following areas:

- Transfer pricing policy design and tax optimisation
- Implementation process advice
- Transfer pricing documentation
- Broader international tax interactions including customs duty
- Intra-group financing and thin capitalisation
- Supply chain restructuring and value chain analyses
- Tax audits and dispute resolution



### Our end-to-end solution

- 1 FEASIBILITY STUDIES**
  - Review of existing policies and business model
  - Assess opportunities to optimise the tax position and increase robustness
- 2 POLICY DOCUMENTS**
  - Develop robust transfer pricing policies
  - Pragmatic and proportionate approach
- 3 BENCHMARKING STUDIES**
  - Array of software tools to undertake studies
  - Key support for transfer pricing policies
  - Loan benchmarking and thin capitalisation analysis
- 4 IMPLEMENTATION SUPPORT**
  - Review transfer pricing calculations and financial outcomes
  - Build and develop transfer pricing models
- 5 DISPUTE PREVENTION**
  - Advance Pricing Agreement (APA) and Advance Thin Capitalisation Agreement (ATCA) can provide tax certainty
  - Transfer pricing increasingly an area targeted by tax authorities
- 6 MASTER/LOCAL FILES**
  - Compliance requirements for international businesses
  - Guided by OECD - delivered from UK

## Tailored solutions

We are the UK's leading integrated professional services and wealth management group. We deliver tailored advice and solutions by taking the time to get to know you and understanding your objectives, needs and aspirations, as well as the longer-term challenges you're likely to face - whether as a business or individual.

## Speak to an expert



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NTAJ14052335,  
05/2024