



## INTERNATIONAL TAX SERVICES

# Transfer Pricing Services

## Assisting Businesses with Global Tax Optimization

Every year more companies expand their international sales and operations as they grow globally. These companies face increasingly complex and material transfer pricing issues as transfer pricing regularly tops the list of enforcement priorities for many tax authorities around the world. In addition to potentially increasing tax burdens, it also adds to the expense and complexity of doing business internationally, as taxpayers try to navigate an ever-changing transfer pricing landscape.

Transfer pricing is no longer just a concern for large multinational businesses. Tax authorities are extending enforcement to middle market companies with significant cross-border activity. International initiatives such as country-by-country reporting force all taxpayers to increase the level of detail and transparency in reports of their business transactions, and subject them to increased government scrutiny.

At the same time, taxpayers can use compliant transfer pricing strategies to efficiently align profit among high-and low-tax jurisdictions, and improve their effective tax rates.

### Transfer Pricing Services

Cherry Bekaert's Transfer Pricing practice assists clients with a full range of transfer pricing issues, including:

- ▶ **Transfer pricing planning:** Design practical and efficient transfer pricing policies and procedures
- ▶ **Transfer pricing compliance:** Prepare global transfer pricing documentation for U.S. and foreign jurisdictions, including Country-by-Country (CbC) reporting
- ▶ **Operational transfer pricing:** Implement and review transfer pricing processes and controls
- ▶ **Supply chain planning:** Consider strategic policy design and international tax planning
- ▶ **Transfer pricing benchmarking:** Benchmark royalty rates, interest rates, and entity profitability
- ▶ **Transfer pricing controversy:** Address controversy and audit defense in the U.S. or abroad, including post audit settlement via Competent Authority
- ▶ **Advance Pricing Agreements:** Unilateral and multilateral transfer pricing agreements with U.S. and global tax authorities

Our dedicated professionals help clients across industries using a level of specialized expertise and technical skills typically found only in the very largest consulting and accounting firms. Appropriate attention to transfer pricing helps our clients to:

- ▶ Identify possible opportunities and implement transfer pricing policies for improved tax efficiencies
- ▶ Be compliant with national and global transfer pricing regulations reducing the chance of transfer pricing adjustments by tax authorities
- ▶ Be protected against transfer pricing penalties
- ▶ Reduce long-run tax compliance costs by establishing efficient policies, procedures, and documentation
- ▶ Reduce risks associated with uncertain tax positions

## How We Can Help: An Experienced Guide for Transfer Pricing Issues

Cherry Bekaert's Transfer Pricing practice comprises a team of economists and tax specialists with decades of combined experience in transfer pricing, assisting hundreds of clients that range in size from a few million dollars to tens of billions of dollars in annual revenue.

Our team is dedicated to providing unmatched client service while never losing the flexibility to customize practical transfer pricing solutions for each of our clients.

Cherry Bekaert is a member of Allinial Global, an accountancy and business advisory global network, which enables us to provide local on-the-ground assistance wherever our clients do business around the globe. For issues related to transfer pricing, you can trust the people at Cherry Bekaert to be your guide forward.



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### About Cherry Bekaert

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