

Over the past few years, transfer pricing has been an area of significant focus for tax authorities across the world.

Many authorities have expanded their requirements for transfer pricing compliance, documentation, and/or transactional disclosures. With each tax authority competing to interpret transfer pricing to their advantage, taxpayers are often caught in the middle. The likely end result? Audit challenges followed by an increase in income tax, double taxation, even penalties and implications for withholding tax, VAT/GST, and customs duties.

Operating a business in this challenging environment, you need a team like ours to help you manage your transfer pricing exposures.

Our team will assist with your transfer pricing planning and policy, by developing a sound and practical approach from day one. Followed by proactive transfer pricing risk management such as developing the documentation, benchmarks, legal agreements, and APA submissions to support your transfer prices. And should you encounter audit challenges, our experienced team of transfer pricing experts is ready to help you achieve a satisfactory resolution.



How we can we help you

Our Baker McKenzie transfer pricing team is staffed by economists, tax lawyers, accountants, and financial analysts — all working together to give you the multi-faceted, incisive advice that you need.

Our transfer pricing services include:

Planning — developing a transfer pricing approach that is robust yet in tune with your commercial objectives;

Documentation — preparation of transfer pricing documentation (including benchmarking) and intragroup legal agreements;

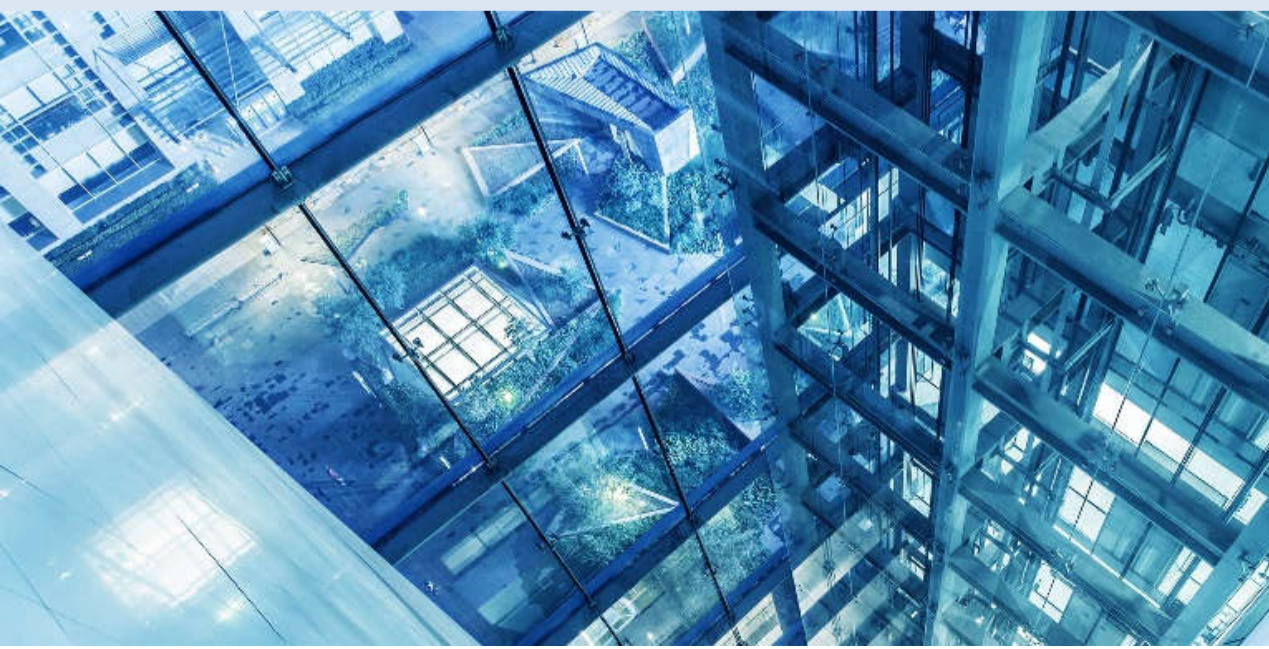
Compliance Reporting — guidance when you prepare your related-party transactions reporting and Country-by-Country reporting;

Risk Assessment & Due Diligence — Evaluating and quantifying transfer pricing risk for M&A, corporate, and FIN 48 purposes;

Audit Defense — defending your transfer pricing approach against challenges from tax authorities;

Dispute Resolution — Assistance in obtaining relief from double taxation and advance pricing agreements with tax authorities; and

Legal — providing legal and litigation services in dealing with tax authorities and other parties.



Transfer pricing expertise

STRATEGY & DEFENSE

- Advised a global pharmaceutical company on strategies to defend a customs valuation and transfer pricing challenge.
- Provided advice on the sustainability of royalty models, including transfer pricing implications for a multinational electronics company.
- Assisted a hard disk drive manufacturer in defending its transfer prices from adjustment.
- Successfully defended a global fragrance manufacturer from a transfer pricing audit by the tax authority.

DOCUMENTATION & IMPLEMENTATION

- Prepared transfer pricing documentation for one of the largest consumer goods manufacturer and implemented a legal framework to reflect the documentation.
- Advised a consumer goods company on its restructuring and prepared transfer pricing and custom valuations documentation to support the new structure.
- Advised a large poultry producer on the transfer pricing implications of their regional business restructuring and prepared transfer pricing documentation.

What they say about us

“Baker McKenzie has a **‘supportive and comprehensive tax practice’** that boasts ‘particular strength on the tax aspects of corporate and project finance transactions.’”

— *Legal 500 Asia Pacific*

“The strength of this firm's tax practice in Thailand is widely recognized. The team is also known for its **excellent relationships with the Thai regulators** and its international network, which enables it to handle many offshore transactions.”

— *Chambers Asia Pacific*

“The well-resourced team at Baker McKenzie focuses on **sophisticated and high-value tax issues** including major structuring and disputes work.”

— *Legal 500 Asia Pacific*

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Over many years, Baker McKenzie has provided thought leadership and partnered with our clients to achieve transfer pricing outcomes that parallel their business and tax planning objectives. As lawyers and economists, our transfer pricing work reflects your legal framework and can withstand challenges from audits and legal proceedings. How can we help you today?

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