

A PRACTICAL & THOROUGHLY UNDERSTANDABLE APPROACH TO TRANSFER PRICING



Transfer Pricing has been named as the single most important international taxation issue for both tax administrations and taxpayers in recent surveys. In response to this, UHY Advisors has taken the lead in assisting clients with transfer pricing matters and addressing the transfer of tangible property, intangible property, services and capital between controlled taxpayers. By relying on UHY Advisors' Transfer Pricing Services team, clients can feel secure as they face the challenge of managing risks and opportunities with the increasing number of taxing authorities that impose transfer pricing reporting requirements.

EXPERTISE

UHY Advisors' professionals have years of consulting experience, as well as substantial practical know-how from working in industry and with clients, with the implementation of transfer pricing structures. We utilize this expertise to work with clients to produce practical and efficient transfer pricing arrangements and necessary documentation.

DESIGN AND IMPLEMENTATION

Our approach is driven by our experience. It has been developed over the past 20 years while complying with the various global transfer pricing documentation requirements and while seeking agreements from taxing authorities on transfer pricing matters. These agreements include tax audit resolutions, advance pricing agreements ("APAs"), Competent Authority negotiations and other similar tax matters.

Our documentation approach meets not only the U.S. and Organization for Economic Cooperation and Development ("OECD") reporting requirements, but also connects the related party transactions to the audited financial statements and the tax returns in an integrated manner. This connection, in sharp contrast to most models that merely focus on the economics of the related party transactions, enables a company to assess its transfer pricing risk and is a critical piece in our transfer pricing documentation process.

This documentation approach was presented to, and adopted by, the International Chamber of Commerce ("ICC"), headquartered in Paris, France.¹ The documentation package covers all of the requirements of the U.S. treasury regulations and the OECD Guidelines. It has also been used and accepted by U.S. and foreign taxing authorities in obtaining APAs and resolving tax disputes. Clients and IRS agents have stated that this is a "practical and thoroughly understandable approach to transfer pricing."

WHY UHY ADVISORS FOR TRANSFER PRICING

SOLUTIONS

UHY Advisors' Transfer Pricing Services team assists clients with the following transfer pricing documentation matters:

- Developing and implementing transfer pricing strategies that comply with the local requirements and support the overall international tax strategies
- Bringing the global transfer pricing compliance requirements in-house by developing global transfer pricing templates that are company specific and that tie to audited financial statements and income tax returns
- Creating optimal tax structures through operational planning, including the realignment of manufacturing, procurement, distribution and other service operations

In addition, we also provide other transfer pricing related services such as:

- Transfer Pricing Risk Management
- Tax Risk Analysis for Uncertain Tax Positions (FIN 48)
- Development of Global Transfer Pricing Policies and Inter-company Arrangements
- U.S., OECD and State Transfer Pricing Documentation
- Competent Authority Support
- Advanced Pricing Agreements
- Related Party Services and Cost Sharing Arrangements
- Valuation of Intangible Property
- Transfer Pricing Outsourcing Services

For more information on our transfer pricing services, we welcome you to contact one of our Transfer Pricing Services team members:

CONTACT US

Klaus Oehring

Director of Transfer Pricing
Practice Leader
Houston, TX
koehring@uhy-us.com
713-407-3184

Fred Corso

Principal
International Tax
Boston, MA
fcorso@uhy-us.com
617-994-0017

Jerry Seade

Principal
International Tax
Houston, TX
jseade@uhy-us.com
713-407-3795

Dennis Petri

Managing Director
International Tax
Sterling Heights, MI
dpetri@uhy-us.com
586-843-2520

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