

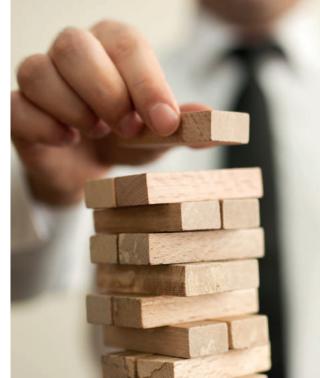
Transfer Pricing Management in Multinational Corporations

Transfer Pricing Management in Multinational Corporations

- Efficient structuring, coordination and administration of business transactions between related parties and associated enterprises
- Generation and management of transfer pricing documentation packages compliant with local and international tax law

• Compliance management in your global organization

The GTP® Team offers numerous cooperation models in the consulting business on transfer pricing and international taxation. We deliver consulting services, financial analysis services including reporting services, as well as stand-alone tools and complex IT solutions. Our solutions are delivered to multinational headquarters and their tax-paying units around the globe as well as international tax experts.



How the GTP[®] Team can assist you in transfer pricing?

Know-How



- Operative transfer pricing
 Smart documentation solutions
- Benchmarking, data analysis services, arm's length documentation
- Transfer pricing management & organization

Technology & Solutions



- GTP[®] applications for Enterprise Content Management technologies
- GTP[®] applications for Business Intelligence technologies
- Stand-alone tools

Consulting Services



- Transfer pricing analysis, calculations, valuation
- Structuring and drafting the Masterfile, Countryfiles, and the CbC-Reporting
 Coaching, training



GTP® Services



- Multinational corporate groups (headquarters, subsidiaries)
- Tax consulting units (advisor, accountants, audit firms)
- Tax administrations, courts



Expertise matters in a world of change

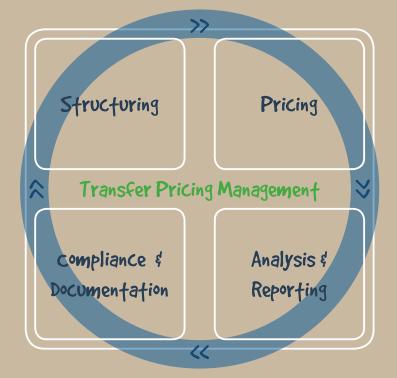
- More than 300 transfer pricing projects on multinational groups around the globe
- Cooperation and project experience with more than 100 teams of tax consulting firms
- Country expertise around the globe, headquartered in Europe, Asia or the USA
- O Special expertise on mid-sized groupsO Cross-industry expertise



Transfer pricing and cross-border income allocation between associated companies are the hot topics of global business developments. Examples of related-party business transactions under the law of obligations are:

- Exchange of raw material and commodities
- Exchange of finished product and warranty services
- Management services and shared services
- Group financing and financial services
- Usage and licensing of tangible and intangible assets
- Employee secondments
- Business restructuring and base shifting

The **GTP® MANAGER** tools allow you to manage the transfer pricing system on price setting and documentation of multinational groups. Governance, coordination, analysis, administration, and documentation: a coherent concept and save solutions for your transfer pricing model.



"Optimizing transfer pricing is more about the arm's length nature of cost allocation rather than the profit allocation. Obviously, the former one represents the larger portion of the value chain from the raw material to the customer's purchase."

> Dr. Markus Brem Managing Director



GTP[®]GlobalTransferPricing Business Solutions

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