



Transfer Pricing Advocacy Management

KPMG Transfer Pricing



Are you ready for the controversy challenge?



What touchpoints do you have with tax authorities?



How complex is your group's audit profile?



How much do you spend on tax audits?

Tax controversies are expected to surge in a changing tax landscape where the introduction of international measures lead to a more transparent world. Tax authorities across the globe have already begun to step up scrutiny, instituting new transfer pricing rules using modern digital methods in their audits. A recent KPMG survey reveals that many of our clients do not feel adequately prepared to coordinate and address the multitude of issues raised by today's rapidly shifting enforcement landscape.¹

“ Understand where you stand in managing your controversy priorities compared to your peers and industry best practices ”

Controversy Readiness

“ We provide insights and practical steps to help your organization prepare for potential queries, audits and challenges from tax authorities ”

Controversy Remediation Services



“ Develop an optimal audit process that works for your company and enables you to efficiently prepare and manage your company's dispute inventory ”

Tax Audit Process Optimization

“ We help you obtain certainty and align complex business transactions ”

APA (Advance Pricing Agreement) and business model alignment services

¹ KPMG September 2017 e-brainstorming session (attended by controversy leaders at 52 multinational companies).

² Global tax controversies are increasing; the global inventory for Mutual Agreement Procedure (MAP) cases increased from 2,352 in 2006 to 6,176 in 2015.

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Offering	What we do	What you get
Controversy Readiness	Review of current-state, identification of key strengths and risks, and provision of recommendations to bring the group to a best practice aligned end state tailored to its resources and risk profile.	Controversy Readiness Report
Tax Audit Process Optimization	Analyze the current state tax audit process and assist in taking practical steps to improve your in-house processes in order to effectively prepare for and manage the expected surge in tax controversies.	Tax Audit Process Manual and Action Plan
Controversy Remediation Services (Audit/MAP support)	Provide support during tax authority examination/audit with an experienced global team of experts that have successfully resolved examinations at all possible levels, from proposed adjustments by field auditors, through to administrative appeals, litigation and MAP.	Efficient and effective support to resolve your controversy situation
APA Services/ Business Model alignment	Assistance with APA services to proactively manage potential global transfer pricing disputes on complex business transactions and to improve both efficiency and effectiveness in the group's set-up. Assessing business model alignment opportunities, using a value chain analysis identifying underlying value drivers and the control of risk functions associated with them, in order to mitigate the risk of related adjustments.	<ul style="list-style-type: none">– Support in APA– Value Chain Analysis report– Business Model Alignment Roadmap

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