KPMG

Transfer pricing - our team and services offering

Tomislav Borošak
Director
Taxation Services
E: tborosak@kpmg.com
T: +3851 5390 171

Lana Pavić
Assistant Manager
Transfer Pricing Services
E: lpavic@kpmg.com
T: +3851 5390 139

Marin Grubić
Supervisor
Transfer Pricing Services
E: mgrubic@kpmg.com
T: +3851 5390 132

Marija Kovačević
Supervisor
Transfer Pricing Services
E: mkovacevic@kpmg.com
T: +3851 5390 218

Ana Sabolović
Supervisor
Transfer Pricing Services
E: asabolovic@kpmg.com
T: +3851 5390 213

How can we help?

I. Preparation of transfer pricing documentation

- Preparation of transfer pricing Master File at group level.
- Preparation of local transfer pricing studies for group subsidiaries.
- Preparation of benchmarking analyses for all types of related party transactions (goods / services / intellectual property / loans / cash pooling).
- Critical review and localisation of centrally prepared transfer pricing documentation and benchmarking analyses.
- Preparation and / or review of annual "PD-IPO forms" to be submitted to the Croatian Tax Authorities.

II. Transfer pricing advisory services

- Development of transfer pricing models for calculation of prices in related party transactions.
- Development of cost allocation models for transactions involving provision of services within a group.
- Critical review of existing transfer pricing models and contracts concluded with related parties to identify potential tax risks and optimisation of such transactions.
- Tax advisory services concerning related party transactions (covering corporate profit tax, VAT and other implications).
- Assistance with preparation of contracts in respect of transactions between related parties.
- Assistance with set-up of documentary evidence concerning transactions with related parties to support justification of services received.
- Simulations of tax audits focusing on related party transactions.

III. Country By Country reporting

- Preparation of Country By Country reports.
- Preparation of Country By Country notifications.