

Transfer pricing – our team and services offering



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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 / intangibles / 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.
- Update of transfer pricing documentation prepared for previous years (Master File / Local transfer pricing studies / Benchmarking analyses).

II. Transfer pricing advisory services

- **Analysis of impact of COVID-19 disruption on the transfer pricing position in 2020 and advice on how to avoid adverse tax implications.**
- **Re-evaluation of existing transfer pricing models and benchmarking analyses as a result of COVID-19 disruption to optimise tax position.**
- Performing Value Chain Analysis to identify potential risks in the current pricing arrangements and suggest corrective action.
- Development of transfer pricing policies for all types of related-party transactions, including set-up of supporting documentation system.
- Development of cost allocation models for transactions involving provision of services within a group.
- Critical review of existing contracts with related parties and system of supporting documentation to identify potential tax risks and optimisation opportunities.
- Tax advisory services concerning related party transactions, including assistance with preparation of contracts between related parties.
- 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.