



Transfer pricing

our team and the services we offer



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How can we help?

I. Preparation of transfer pricing documentation

- Preparation of mandatory / local transfer pricing documentation.
- Preparation of benchmarking analysis for all types of transactions (goods / services / intangible assets).
- Analysis of financial transactions in accordance with the OECD methodology (using the Refinitiv Eikon database and Moody's RiskCalc tools).
- Preparation of Master file - transfer pricing documentation at the group level. Review and localization of centrally prepared transfer pricing documentation and benchmarking analysis.
- Review of the group transfer pricing policy from the aspect of local transfer pricing rules.

II. Transfer pricing advisory services

- Advising on tax effects related to intercompany transactions, including assistance in preparing intercompany agreements, as well as identifying potential tax risks related to transfer pricing and suggestions for further steps in order to adequately manage these risks.
- Value Chain Analysis in order to identify potential risks of the existing way of determining prices and propose solutions.
- Development of transfer pricing policies for all types of intercompany transactions, including the set-up of supporting documentation system.
- Support in the preparation of cost allocation models for intercompany services.



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- Revising existing intercompany agreements and ways of documenting transactions to identify potential tax risks and optimization options.
- Analysis of the impact of the COVID-19 pandemic on transfer prices in 2020 and advice on how to avoid negative tax effects. Revision of the existing transfer pricing model and benchmarking analysis in the context of COVID-19 in order to optimize the tax position and define transfer pricing approaches in the forthcoming period.