



Together we think differently

Transfer Pricing Dispute Prevention and Resolution



Why us

01 Trust - we engage constructively and transparently with HMRC and they see a difference in us.

02 Our specialists in transfer pricing and tax dispute resolution work as an integrated team adopting a commercial and practical approach to deliver optimal outcomes based on your circumstances.

03 Effective transfer pricing dispute resolution requires innovative thinking and collaboration to consider different perspectives and find areas of common ground – together we think differently.

04 Our team has over 50 years of tax authority experience including over 20 years as UK competent authority working MAP and APA cases.

05 Given the increasing globalisation of transfer pricing disputes, coordination and alignment is key - we bring our extensive global network, technology solutions and expertise in disputes to help you navigate this challenge.

Working with you



Issue Identification

Based on our experience and ongoing dialogue with HMRC, we identify likely focus areas early and work with you on strategic planning to establish the options available and their pros and cons, develop clear recommendations on approach and ensure stakeholder alignment, proactive resolution as well as help you with defence and evidence preparation.



Audit Readiness

We support you with enhanced defence documentation (including value chain analysis) and evidence preparation for important transactions that are at higher risk of tax authority scrutiny. We can perform deep dive DEMPE and risk control assessments for specific case study assets and projects using forensics technology and our bespoke DEMPE risk assessment methodologies.



Audit

Audits are complex and time consuming - we work with you and your various stakeholders to develop strategies and workplans that leverage business insight efficiently and reduce the impact on the business. We have a proactive and collaborative approach to working with HMRC which brings structure and is effective in clarifying the issues and information needs.



Audit Finalisation

If views become entrenched and the matter progresses through the dispute lifecycle, we bring different strategic thinking to your approach to resolve the matter – in particular, we consider when and how to employ alternative pathways without the need of litigation.



Advance Pricing Agreements and MAP

Through our global TP controversy network we have extensive experience of successfully using APAs and Competent Authority engagement as a tool to prevent and resolve disputes collaboratively, across jurisdictions and providing certainty for future years.



Legal Advice and Dispute Resolution

Our award winning Tax Disputes team in KPMG Law provide clients with privileged legal advice, and support on options for dispute resolution, including ADR and litigation.

OUR LEADERS - READY TO HELP YOU

We unlock **multiplied value** for our clients by combining the unique capabilities of TP, Tax Disputes, Expert Economists and Tax Valuations.



Depth of technical and sector expertise, innovation and commercialism



Breadth of controversy experience and strategic focus



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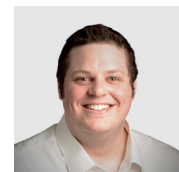
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