



# Transfer Pricing in the Middle East

# Our Transfer Pricing Value Proposition

## Tax Controversy and Dispute Resolution

- With more and more countries adopting Transfer Pricing legislation into their domestic framework, transfer pricing audits and controversies are on the rise. As tax authorities gain more experience in dealing with various taxpayers, their expectations of the taxpayers grow thus making audits detailed and thorough.
- The new environment requires taxpayers to be take proactive steps to identify their transfer pricing arrangements, understand the documentation requirements and engage in discussions internally as well as with subject matter experts.
- Our team carries extensive experience in dealing with a variety of Transfer Pricing matters across multiple jurisdictions and will bring in that experience to assist you in Transfer Pricing disputes, including settlement strategies and litigation support.

## Planning

- Functions, assets and risk analysis
- Risk Assessment
- Practical and scalable Transfer Pricing planning and structuring solutions for tax and financial stakeholders:
  - Transfer Pricing model review
  - Optimal Transfer Pricing model design
  - High-quality pricing analysis for intra-group transactions
  - Transfer Pricing policy and strategy design
- Intellectual Property management
- Business model alignment with substance
- Value chain and supply chain analysis



## Compliance Documentation

- Preparation of transfer pricing documentation (Local File) to meet the local statutory requirements
- Assistance in preparation of Country by Country Reporting (CbCR) and Master file
- Annual Disclosure form (preparation and filing assistance)

## Implementation

- Identification of transactions
- Implementation and monitoring adherence to Transfer Pricing policies
- Clear, understandable dialogue with stakeholders
- Consideration of practical consequences of tax and Transfer Pricing models
- Tax technology assistance
- Translating Transfer Pricing policies into internal manuals and guidance

# Why us?

1

A focused team for your needs

We have an experienced team of Transfer Pricing professional with international experience with proven track record of delivering end to end Transfer Pricing solutions to the clients.

2

Market footprint

We have a large market footprint and connected globally.

3

Coordinated approach

Customised and coordinated approach in providing Transfer Pricing solutions to suit your requirements.

4

Expertise delivered on time

We work with streamlined technologies to help you address the issues faster.

## Supporting you wherever you are

As the Middle East Transfer Pricing Centre of Excellence, we support businesses across the Middle East with their Transfer Pricing requirements.



### Middle East Transfer Pricing Centre of Excellence

-  Offices in Dubai, Abu Dhabi and the Northern Emirates
-  We offer Transfer Pricing support and advice to clients with operations across the GCC and Middle East

# Transfer Pricing Team

Our diversified team of Transfer Pricing subject matter experts combine a perfect blend of international experience across several industry sectors, technical expertise, and commercial nuances with a commitment to deliver exceptional value to your business.



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