


 TAX SERVICES

Transferring Pricing

2019

A&A can help multinational companies manage their transfer pricing risks by providing practical solutions that fit in to the overall objectives of the business whilst satisfying local transfer pricing requirements. We can also assist with audit defence, dispute resolution (such as mutual agreement procedure/competent authority) and negotiating advance pricing agreements (where clients prefer to access greater certainty on their transfer pricing methods with the ATO).

Specifically, we can:

- Prepare transfer pricing documents in accordance with the new Australian self-assessment regime to allow the taxpayer to achieve a reasonably arguable position (RAP) to minimise potential tax penalties.
- Assist with the preparation and review of International Dealing Schedule (IDS) disclosures.
- Assist in the design / benchmarking of an optimal transfer pricing structure based on your value chain and the location of key operational personnel/assets/risks in the business, having regard to the new regulations from the OECD on intellectual property.
- Assist with an ATO risk review/audit.
- Assist with an Advance Pricing Agreement (APA).
- Assist clients comply with new BEPS rules and assist with BEPS compliance in preparing a CbCR report, master file and Australian local file.

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About A&A Tax Legal Consulting

A&A Tax Legal Consulting is a world class tax, legal and consulting business advisory services firm providing solutions to organisations who operate internationally in respect of compliance, planning, management and transactions. A&A professionals work closely with clients to anticipate, illuminate and overcome complex business challenges and opportunities. A&A has offices in Melbourne and Sydney, Australia.

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