

Transfer Pricing Services

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www.urishpopeck.com



What is the Service

Multinational tax challenges are among the most complex and potentially expensive issues facing companies with international operations. At the same time, this complexity provides a variety of opportunities to optimize profits, increase cash flows and moderate taxes.

Urish Popeck's transfer pricing practice assists companies and their affiliates in dealing with the unique tax consequences – international and domestic- related to intercompany pricing issues to identify planning opportunities and assist with compliance and audit resolutions. Our professionals work to develop transfer pricing policies that are defensible, flexible and congruent with your company's overall tax planning, so that you can focus on other operational business objectives.

Our team is comprised of economists, tax practitioners and financial analysts who can help address issues arising in related-party transactions such as:

- Transfer of tangible products
- Development, transfer or sharing of intellectual property
- Provision of beneficial services
- Extension of loans or financial arrangements that involve intercompany funds

Our Approach

Urish Popeck offers an approach that integrates our transfer pricing resources with those of international, state & local and federal tax, and includes the development of cross-border tax planning ideas. We can help you develop approaches to complex intercompany transactions that may add value to your business operations from both a tax management and implementation perspective.

Services Offered

Planning

- Intangible holding company structures
- Intangible property valuations and buy-in payments
- Cost-sharing arrangements
- Market penetration strategies
- Supply chain planning
- Mergers and acquisitions due diligence services

Compliance Services

- Documentation studies (global and country-specific)
- Advance pricing agreements (APAs)
- Intercompany policy and implementation guidelines
- Intercompany agreements

Audit Defense Support

- Tax authority response and negotiation
- Dispute resolution
- Competent authority submissions
- Litigation support and testimony

Benchmarking Services

- Financial ratio analysis
- Capital structure analysis
- Effective tax rate analysis
- Royalty rate analysis

For more information, please contact Bill Adams at 888.287.0335 or email wjadams@urishpopeck.com