CENSIO

Implementing a Robust Transfer Pricing Policy & Routines

The client and challenge

A healthcare provider with international growth, faced increasing requirements to manage intercompany transactions in a compliant and transparent manner. The Finance and Tax Teams needed to establish both understanding and operational structure. At the same time, it was essential to establish a model which reduced the risk in potential audits, while remaining practical for the client's daily operations.

Process and implementation

We began with a workshop that combined an introduction to TP with a mapping of the intercompany transactions and a functional analysis. Through this collaborative process, we identified the key areas requiring attention and aligned the framework with the operational realities.

Next, we developed a tailored TP policy, drafted intercompany agreements, and prepared the documentation required to comply with local regulations.

Later that year, we assisted the client with Country-by-Country reporting and with management fees for the coming year budget process, completing a full-cycle support process from the very beginning to the final filing.

Throughout the process, we focused on making the new framework easy to implement, ensuring the client could manage their daily operations without friction.

Solution and impact

The client now has a robust TP framework that is both compliant and manageable. With this setup, the client can manage their own pricing, documentation, agreements, and the Country-by-Country reporting with confidence, knowing they have a defensible position. While we continue to provide review and guidance, the client is now fully in control of *their* process.

Our goal is always to balance theory with pragmatic application, enabling clients to stand independently while having us as a trusted partner for support when needed.