

Navigating the compliance season without the dread of the TP process.

"I now feel confident managing the process myself"

For a rapidly expanding multinational group, Transfer Pricing wasn't a new concept. But as the business grew, their existing framework couldn't keep pace. They needed to scale their compliance to match their new reality - without getting lost in academic theory.

The reality check

It's a familiar scenario for finance and tax professionals: the nagging awareness that the intercompany policies aren't fully aligned with how the business actually operates day-to-day. As tax authorities demand more transparency, the gap between "what's in the manual" and "what actually happens" becomes a liability. The result is often a stressful compliance season and a TP model you don't feel entirely comfortable defending.

That was exactly the challenge our client faced.

A pragmatic approach

We kicked off the work by focusing on what was actually going on in the business. We mapped their real intercompany transactions and did a functional analysis based on conversations, not guesswork.

From there, we developed a tailored TP policy and drafted the necessary intercompany agreements. The goal wasn't to fill up binders, but to ensure robust, local compliance. Finally, we supported the team through the full cycle—from Country-by-Country reporting to integrating management fees into their upcoming budget process.

The result: Independence

Today, the client manages their own documentation and filings with peace of mind. They have a set-up that is fully defensible to the tax authorities because it's built on their actual daily operations.

Our approach has always been simple: We balance theory with pragmatic application. We would much rather make our clients independent than make ourselves indispensable.