



Rachit Agarwal
TRANSFER PRICING DIRECTOR

rachit.agarwal@dlapiper.com

London

T: +44 (0)20 7153 7105
F: +44 (0)20 7796 6666
M: +44 (0)796 855 8623

Rachit Agarwal has gained significant experience in transfer pricing having worked in India, the Netherlands and in UK. He has been involved in a variety of transfer pricing matters ranging from advisory, audit support, compliance, risk assessment and mitigation and restructuring spanning different geographies.

**LANGUAGES
SPOKEN**

Hindi

His main area of focus is intra-group finance transactions including cash pools, loan portfolio valuations, debt pricing, guarantee fees, factoring arrangements, debt capacity review, derivatives analysis, designing group financing policies, etc. The other areas where he has worked include asset valuations, business restructuring, exit charge assessment, value chain analysis, transfer pricing policy design and anti-trust matters. He has also been involved in developing audit defence strategies on various transfer pricing matters across Asia, Europe and North America.

Rachit is an instructor for transfer pricing courses conducted at International Bureau of Fiscal Documentation and has lectured on transfer pricing at Vienna University, Leiden University and Maastricht University. Further, he has held transfer pricing training sessions for clients and has been a speaker at various conferences. He also regularly publishes articles on transfer pricing matters in leading tax journals.

LANGUAGES SPOKEN

- Hindi

EXPERIENCE

- Successfully defended the intra-group financing structure and valuation of intangibles with Dutch Tax Authorities
- Significantly involved in the APA process for a number of multinationals with the Dutch Tax Authorities
- Designed a group-wide cash pool and long term financing policy for a European life sciences major
- Valued a portfolio of financial instruments to be transferred from Belgium to the Netherlands and significantly reduced the capital gain tax impact by pricing embedded options
- Designed transfer pricing model and a tax impact in APAC and Europe for a consumer goods major

CREDENTIALS

Education

- CFA Institute, CFA Level III Candidate
- University of Amsterdam, Masters of Science, Economics, 2010
- University of Delhi, Bachelor of Arts (H), Economics, 2006

INSIGHTS

Publications

Transfer Pricing Masterclass Series

23 July 2019

The DLA Piper Transfer Pricing Team recently presented a series of Transfer Pricing Masterclasses on a variety of topics.

Global Tax Alert: Cash pools and transfer pricing - 10 things to consider

11 JUN 2019

Transfer Pricing

Cash pooling is a valuable treasury tool for practical, day-to-day cash management. Yet, it has become clear in recent years, however, that cash pooling arrangements can also create certain transfer pricing risks. This article provides ten important considerations, which will assist in the structuring of cash pooling arrangements.

The demise of LIBOR and its impact on intra-group financing arrangements - a transfer pricing perspective

30 MAY 2019

The London Interbank Offered Rate (LIBOR) will cease to exist by the end of 2021. It is anticipated that this will have ramifications for the commercial loan markets, as well as for intra-group financing arrangements. This article considers the transfer pricing implications of this development and actions that multinationals need to take.

- Brand Intangibles - Getting it right for Tax Purposes, May 2017
- Foreign Exchange Risk Management and Control Post BEPS Combined with Turmoil in Global Currency Markets, Dec 2015

Events

Previous

Webinar: COVID-19 and Transfer Pricing

22 April 2020

Webinar

Intra-group Financial Transactions Webinar – OECD’s final say

17 February 2020
Webinar

Transfer Pricing Masterclass 5 - Landing the Value: Centralized Controversy Management for Transfer Pricing

26 September 2019
Transfer Pricing Masterclass Series 2019
London

Transfer Pricing Masterclass 4 and drinks networking – Doing your duty: Transfer pricing, tax and beyond

10 July 2019
Transfer Pricing Masterclass Series 2019
London

Transfer Pricing Masterclass 1 - Knowing the Issues: Identifying Transfer Pricing Risk and Opportunity

10 April 2019
Transfer Pricing Masterclass Series 2019
London
