



## Transfer Pricing

Our award-winning transfer pricing team consists of economists and lawyers who help multinationals design, implement, document and defend cross-border intra-group transactions.

### Unlocking opportunities and reducing risks

In the current ever-changing environment, many multinationals are increasingly challenged to have a global strategic approach to transfer pricing. Controversy is on the rise globally, with transfer pricing audits becoming increasingly aggressive, new risks such as 'state aid' in the European Union, emerging markets ramping up, and governments increasingly cooperating and sharing taxpayer information in order to make transfer pricing assessments.

While many firms see transfer pricing as merely a compliance exercise, we see transfer pricing as strategic and global, but with a compliance (documentation) element. As such, we work with clients on all aspects on every phase of the transfer pricing cycle. Our approach to transfer pricing involves a keen understanding of how tax authorities approach issues globally and the ability to find solutions that work for businesses as well as the bottom line.

### Transfer Pricing: Strategic perspective

Transfer pricing is an area where economics, business and law are entangled. Therefore, our transfer pricing toolbox includes an economic and commercial approach grounded in the way the business operates while ensuring that legal issues and complexities are managed efficiently. Within our team, economists undertake quantification exercises whereas the lawyers review, implement and defend structures from a legal perspective. This unique combination of economics and law within a global law firm provides an opportunity to use transfer pricing as a tool to achieve tax efficiency.

## INSIGHTS

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### RELATED SERVICES

- International Corporate Reorganizations

## **DLA Piper Transfer Pricing Masterclass**

13 November 2019  
Transfer Pricing Masterclass Series 2019  
Johannesburg

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

26 September 2019  
Transfer Pricing Masterclass Series 2019  
London

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

10 July 2019  
Transfer Pricing Masterclass Series 2019  
London

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### **Transfer Pricing Masterclass 3 - Interested in Interest: Financial Transactions in Transfer Pricing**

5 June 2019  
Transfer Pricing Masterclass Series 2019  
London

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### **Transfer Pricing Masterclass 2 - Between the Uprights: Valuations in Tax and Transfer Pricing**

8 May 2019  
Transfer Pricing Masterclass Series 2019  
London

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

10 April 2019  
Transfer Pricing Masterclass Series 2019  
London

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## **NEWS**

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### **DLA Piper adviseert The Carlyle Group bij investering in HSO Group**

6 September 2019  
DLA Piper heeft The Carlyle Group geadviseerd bij de investering in HSO Group. Het eigen vermogen voor de investering kwam van Carlyle European Technology Partners III Fund (CETP), een fonds van EUR635 miljoen dat investeert in technologiegerichte bedrijven in Europa en de VS.

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## **DLA Piper advises The Carlyle Group on its investment in HSO Group**

6 September 2019

DLA Piper has advised The Carlyle Group on its investment in HSO Group. Equity for the investment is provided by Carlyle European Technology Partners III Fund (CETP), a EUR635 million fund that invests in technology-focused companies in Europe and the US.

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## **DLA Piper continues Irish expansion with appointment of four new partners**

4 September 2019

DLA Piper today announces the appointment of four new partners to its recently opened Dublin office into four key practice areas of Finance and Projects (F&P), Intellectual Property and Technology (IPT), Tax and Real Estate. The new partners will be joined by three legal directors, as part of the firm's ongoing expansion in Ireland.

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## **DLA Piper advises Allianz Real Estate on the acquisition of EDGE Hafencity in Hamburg**

2 August 2019

DLA Piper has advised Allianz Real Estate on its acquisition of the office property EDGE Hafencity as part of an off-market forward deal. EDGE Hafencity Hamburg will be a 15-storey building with a total lettable area of approximately 22,500 sqm.

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## **DLA Piper advises KRAHN on acquisition of eMBe Products & Service**

26 June 2019

DLA Piper has advised chemical distributor KRAHN Chemie GmbH on its acquisition of eMBe Products & Service GmbH, one of the leading additive manufacturers for the ceramics and powder metal industry in Europe.

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## **DLA Piper advises Rolls-Royce on acquisition of Siemens' eAircraft business**

21 June 2019

DLA Piper has advised Rolls-Royce plc on the acquisition of Siemens' electric and hybrid-electric aerospace propulsion activities, eAircraft. The acquisition will accelerate the delivery of Rolls-Royce's electrification strategy and boost its ambition to play a major role in the "third era" of aviation. The completion of the transaction is expected in late 2019, following a period of employee consultation.

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## **DLA Piper named UK transfer pricing firm of the year for the third year running**

17 MAY 2019

DLA Piper has been named UK Transfer Pricing Firm of the Year for the third year running at the International Tax Review (ITR) European Tax Awards 2019, in a ceremony held in London on 16 May. The firm was also, and for the first time this year, named Africa Transfer Pricing Firm of the Year.

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## **DLA Piper announces launch of Artificial Intelligence practice**

14 MAY 2019

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DLA Piper announced today the launch of its Artificial Intelligence practice, which will focus on assisting companies as they navigate the legal landscape of emerging and disruptive technologies, while helping them understand the legal and compliance risks arising from the creation and deployment of AI systems.

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### **DLA Piper Hamburg: Alter Wall is new office location**

13 MAY 2019

Last weekend DLA Piper has moved from Jungfernstieg to its new premises "Alter Wall Hamburg" in the heart of Hamburg. DLA Piper has moved into the top three floors of the building at Alter Wall 4 that offer a total of around 3,200 sqm of office space.

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### **DLA Piper advises BrewDog on acquisition of iconic Berlin brewery**

6 MAY 2019

DLA Piper has advised BrewDog, a multinational craft brewery and pub chain based in Scotland, on the acquisition of World Bistro & Gardens in Berlin from Stone Brewing, one of the largest craft breweries in the US.

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### **DLA Piper announces partnership promotions for 2019**

1 APR 2019

DLA Piper is proud to announce that 77 lawyers have been promoted to its partnership. The promotions are effective as of April 1, 2019 in the United States and May 1, 2019 for EMEA and Asia Pacific. The promotions were made across many of the firm's practice areas in 43 different offices throughout 20 countries.

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### **Non-resident real estate investors bullish on Capital Gains Tax changes**

19 MAR 2019

Non-resident real estate investors are holding their nerve on UK investment strategies despite impending capital gains tax (CGT) changes coming into force next month and uncertainty around Brexit. According to a DLA Piper report, more than half (58 percent) of those polled expect the new tax code will have no impact on their investment strategy.

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### **DLA Piper announces launch of Blockchain and Digital Assets practice**

26 FEB 2019

DLA Piper announced today the launch of its Blockchain and Digital Assets practice, which will offer strategic advice on a global basis to address the needs of companies implementing blockchain technology solutions and creating and deploying digital assets.

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### **DLA Piper enhances cross-border tax capability with new partner hire in Dublin**

26 FEB 2019

DLA Piper today announces the appointment of Maura Dineen as a Tax partner in the firm's newly opened Dublin office. This is

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the fifth partner hire for DLA Piper in Dublin in a month, following the announcements in January of Conor Houlihan (Finance & Projects), Éanna Mellett (Corporate), Mark Rasdale (Intellectual Property & Technology) and Ciara McLoughlin (Employment).

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#### **DLA Piper strengthens tax offering in Luxembourg with partner hire**

2 JAN 2019

DLA Piper today announces the appointment of Jacques Wantz as a partner in its Tax practice, based in Luxembourg. He will be joined by associate Emre Akan.

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#### **DLA Piper advises Stillfront Group on acquisition of German game developer Playa Games GmbH**

14 DEC 2018

DLA Piper has advised the Swedish company, Stillfront Group AB, on its acquisition of Hamburg-based Playa Games GmbH.

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#### **DLA Piper advises H.I.G. Capital on the acquisition of BollAnts Spa in Bad Sobernheim**

5 DEC 2018

DLA Piper has advised US asset manager H.I.G. Capital on its acquisition of the BollAnts Spa im Park in Bad Sobernheim, in the federal state of Rhineland Palatinate, completed with Hamilton Hotel Investors. The two parties involved have agreed the purchase price will remain undisclosed.

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#### **DLA Piper advises Aareal bank on €447m financing for pan-European hotel portfolio**

23 NOV 2018

DLA Piper has advised Aareal Bank AG in relation to the arrangement of a five-year €447 million financing for a European hotel portfolio managed by Swedish hotel property company Pandox AB.

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#### **DLA Piper advises KGAL Group on its acquisition of „Berliner Freiheit“ in Bremen**

13 NOV 2018

DLA Piper has advised the KGAL Investment Management GmbH & Co. KG on its acquisition of shopping center and neighbourhood hub "Berliner Freiheit" in Bremen, for an undisclosed price.

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#### **DLA Piper advises Columbia Capital, LLC in its US\$21 million equity investment in Resilience360**

13 NOV 2018

DLA Piper represented Columbia Capital, LLC in its US\$21 million equity investment in Resilience360 GMBH.

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#### **DLA Piper advises DASAN Zhone Solutions on intended acquisition of KEYMILE**

24 OCT 2018

DLA Piper has advised NASDAQ-listed DASAN Zhone Solutions (DZS), a global leader in fiber access transformation for enterprise and service provider networks, on its intended acquisition of KEYMILE, a leading solution provider and manufacturer

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of telecommunication systems for broadband access.

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### **DLA Piper advises Family Trust Investor on founding of new private equity fund and expansion of investor base**

11 OCT 2018

DLA Piper has advised the shareholders of Family Trust Investor (FTI) on the founding of a new holding company for private equity transactions. With its new fund FTI has significantly expanded its existing investor base and raised an undisclosed amount of committed capital.

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### **DLA Piper advises exceet Group on sale of its micro- and optoelectronics company AEMtec**

27 SEP 2018

DLA Piper has advised the exceet Group on the sale of their portfolio company AEMtec GmbH - the Berlin based micro- and optoelectronics company - to Mellifera Neunundzwanzigste Beteiligungsgesellschaft.

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### **DLA Piper advises InterContinental Hotels on first Kimpton Hotel opening in Germany**

26 JUL 2018

DLA Piper has advised one of the world's leading hotel companies, the InterContinental Hotels Group (IHG), on the opening of its first Kimpton hotel in Germany. Opening in 2023, the hotel will be situated within a listed building on the Junghofstrasse in Frankfurt's city centre, and will form part of the company's rapidly expanding Kimpton Hotels & Restaurants brand.

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### **DLA Piper Africa welcomes Zimbabwe member firm**

19 JUN 2018

DLA Piper Africa has announced that leading Zimbabwean law firm, Manokore Attorneys, is joining as the member firm in Zimbabwe.

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### **DLA Piper takes home eight awards at 2018 International Tax Review European Tax Awards**

18 MAY 2018

DLA Piper has won eight awards at the International Tax Review European Tax Awards 2018, in a ceremony that took place on Thursday, May 17, 2018 at the Savoy Hotel in London.

The firm has been named UK Transfer Pricing Firm of the Year, Spain Tax Firm of the Year and Gulf Cooperation Council Tax Firm of the Year.

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### **DLA Piper advises Migdal on the acquisition of German light industrial portfolio for €56m**

13 APR 2018

DLA Piper has advised the Israeli insurance company and pension manager, Migdal, on its acquisition of three light industrial properties in Germany from ThreadGreen Industrial for €55.7 million. Migdal completed the acquisition in association with Cording Real Estate Group, a German, UK and Benelux real estate investment and asset management firm.

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### **DLA Piper announces partnership promotions for 2018**

3 APR 2018

DLA Piper is proud to announce that 62 lawyers have been promoted to its partnership. The promotions are effective as of 1 April 2018 in the United States and 1 May 2018 for EMEA and Asia Pacific. The promotions were made across many of the firm's practice areas in 42 different offices throughout 20 countries.

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### **DLA Piper Africa advises Adenia Partners on acquisition of controlling stake in Kanu Equipment Limited**

23 MAR 2018

Kanu has been driving an expansion strategy across Sub-Saharan Africa in recent years and the business now operates in 13 countries, servicing the agriculture, construction and mining industries.

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### **DLA Piper grows Tax practice in Germany with new hire**

8 MAR 2018

DLA Piper is pleased to announce that Dr Marie-Theres Rämer will join the firm as a partner in its Tax practice, based in Frankfurt.

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### **DLA Piper advises Barings on the acquisition of an office building in Munich**

5 MAR 2018

DLA Piper has advised Barings Real Estate on the acquisition of an office building in the Obersendling district of Munich.

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### **DLA Piper advises Cabinet Group on Funcom joint venture**

9 FEB 2018

DLA Piper represented Cabinet Group LLC on tax and Norwegian law matters in its joint venture with Funcom N.V., a Norwegian developer, to establish Heroic Signatures.

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### **DLA Piper advises HanseMerkur on its acquisition of BBG Office Center in Böblingen**

29 JAN 2018

DLA Piper has advised HanseMerkur Grundvermögen AG on its acquisition of the BBG Office Center located on the Böblinger Flugfeld development site for the open-ended special AIF "HMG Grundwerte Deutschland Südwest."

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### **DLA Piper advises Tishman Speyer on rental agreement with Naspers**

29 JAN 2018

DLA Piper has advised the international project developer and fund manager, Tishman Speyer, on the leasing of 9,500 square meters of its recently acquired "Pressehaus am Alexanderplatz," located on Karl Liebknecht Strasse, to the international internet and entertainment group Naspers.

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### **DLA Piper advises the founding shareholders of Deekeling Arndt Advisors on sale to Havas Group**

25 JAN 2018

DLA Piper has advised the founding shareholders of Deekeling Arndt Advisors in Communications GmbH (DAA) on the sale of the majority of their shares to Havas Group. The founders Egbert Deekeling and Olaf Arndt who prior to the transaction held the majority of shares and also lent their names to DAA, will remain in charge over the long term and continue to head over the company's operative business as shareholders and managing directors. The company name will also remain unaffected.

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### **DLA Piper advises Active Ownership Capital on the acquisition of brake system manufacturer PINTSCH BUBENZER**

25 JAN 2018

DLA Piper has advised the Luxembourg-based investment company Active Ownership Capital on the acquisition of PINTSCH BUBENZER, a leading provider of industrial brakes and subsidiary of Schaltbau Holding AG.

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### **DLA Piper advises ASC Investment on the acquisition of VITRABLOK**

22 JAN 2018

DLA Piper has advised Luxembourg-based private equity firm ASC Investment on the acquisition and the financing of VITRABLOK a specialist glass block manufacturer. This is the first acquisition for ASC Investment.

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### **DLA Piper advises alstria office on the sale of an office building in Frankfurt to Cresco Capital**

4 JAN 2018

DLA Piper has advised the commercial REIT alstria office on the sale of an office and business property to Cresco Capital Group, with the purchase price amounting to €44 million.

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### **DLA Piper launches Middle East Tax practice**

4 DEC 2017

DLA Piper has strengthened its International Tax practice with the appointment of Ton van Doremalen as partner and Head of Tax in the Middle East. Ton joined the firm's Dubai office on 3 December 2017.

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