



## 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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### Events

#### Previous

##### Japan Tax and Transfer Pricing Seminar

25 Feb 2020  
Transfer Pricing Masterclass Series 2019  
London

### KEY CONTACTS

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### RELATED SERVICES

- International Corporate Reorganizations

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## **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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## **NEWS**

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### **Masatake Kuramoto joins DLA Piper as principal economist in New York**

9 April 2021  
DLA Piper announced today that Masa Kuramoto has joined the firm as a principal economist based in New York.

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### **DLA Piper advises Manulife on its acquisition of 39 Martin Place**

29 January 2021  
DLA Piper has advised international financial services group Manulife Financial Corporation on its 50/50 joint venture with Investa Commercial Property Fund (“ICPF”) to acquire the right to a 100% interest in 39 Martin Place, Sydney from Macquarie Group

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Limited (ASX: MQG).

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### **DLA Piper boosts Tax practice in Luxembourg with new partner hire**

4 January 2021

DLA Piper is pleased to announce that Luis Muñoz is joining as partner in its Tax practice, based in Luxembourg.

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### **International tax lawyer Peng Tao moves to DLA Piper in Northern California**

2 November 2020

DLA Piper announced today that Peng Tao has joined the firm's Tax practice as a partner in Northern California.

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### **Eileen O'Pray joins DLA Piper's Tax practice in Northern California**

28 September 2020

DLA Piper announced today that Eileen O'Pray has joined the firm's Tax practice as a partner in Northern California.

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### **DLA Piper advises P3 Logistic Parks on the rental of commercial space to Makita Werkzeug GmbH**

27 August 2020

DLA Piper has advised P3 Logistic Parks GmbH on the rental of commercial space to Makita Werkzeug GmbH.

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### **DLA Piper advises Syngenta on the acquisition of South African Sensako Group**

17 August 2020

DLA Piper has advised Swiss-based Syngenta Group on its acquisition of Sensako Group, a South African seeds company engaged in the breeding and the commercialization of agronomic crops.

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### **DLA Piper lawyers and practices ranked in latest Chambers edition**

8 May 2020

DLA Piper today announced that the firm received 172 lawyer rankings and 71 practice rankings in *Chambers USA's* 2020 guide.

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### **DLA Piper announces partnership promotions for 2020**

30 April 2020

DLA Piper is proud to announce that 67 lawyers have been promoted to its partnership. The promotions are effective as of April 1, 2020 in the United States and May 1, 2020 for EMEA and Asia Pacific. The promotions have been made across many of the firm's practice areas in 35 different offices throughout 13 countries.

Across the firm's practices globally, Corporate saw the largest intake of new partners with 19 promotions, followed by Litigation and Regulatory with 15. Intellectual Property and Technology and Finance and Projects had ten and eight promotions respectively, while there were six in Real Estate. Tax and Employment both had four, and there was one in Restructuring.

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## **DLA Piper lawyers named Acritas Stars**

10 March 2020

Acritas has named over 200 DLA Piper lawyers as 2020 Acritas Stars. Now in its fourth year, Acritas Stars highlights the stand-out lawyers in private practice as nominated by clients around the world. More than 3,000 senior in-house counsel feed into the nomination process to give a comprehensive view of highly recommended lawyers across the globe.

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## **DLA Piper advises Hahn Group on sale of Campus Center Lübeck**

18 December 2019

DLA Piper has advised Hahn Group on the sale of Campus Center Lübeck to real estate investment manager Nuveen Real Estate, which acquired the property for its German core retail platform.

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## **Afshin Beyzaee named to *Variety's* Dealmakers Impact Report**

4 December 2019

DLA Piper is pleased to announce Los Angeles-based partner Afshin Beyzaee has been selected for the 12th annual *Variety* Dealmaker Impact Report.

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## **DLA Piper partner Diana Erbsen named chair of IRS Advisory Council**

2 December 2019

DLA Piper is pleased to announce that the Internal Revenue Service has appointed Diana Erbsen chair of the Internal Revenue Service Advisory Council (IRSAC).

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## **DLA Piper launches Global Digital Services VAT Guide**

29 November 2019

DLA Piper has launched the fourth edition of its Global VAT Guide on Digital Services, covering cross-border supplies of digital content, intangible services and, more generally, the various forms of e-commerce.

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## **DLA Piper advises on the USD225 million investment in Russia's retailer Familia by TJ Maxx owner**

25 November 2019

DLA Piper has acted as lead tax advisor to several shareholders of Familia, Russia's leading off-price apparel and home fashions retailer, on the USD225 million sale of a 25% minority ownership stake to The TJX Companies, Inc.

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## **DLA Piper announces launch of LIBOR Transition practice**

23 September 2019

DLA Piper announced today the launch of its LIBOR Transition practice, which will focus on assisting companies with impact assessment and advising on benchmark reform implementation across multiple jurisdictions and products.

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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 announces launch of Artificial Intelligence practice**

14 MAY 2019

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 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 lawyers and practices ranked in latest Chambers edition**

30 APR 2019

DLA Piper today announced that 158 of the firm's lawyers and 64 of its practices were ranked in *Chambers USA's* 2019 guide.

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