



## 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.

PRIMÆRE  
KONTAKTPERSONER

**Randall Fox**

London

Tlf.: +44 (0)20 7796 6928

[randall.fox@dlapiper.com](mailto:randall.fox@dlapiper.com)

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