



TRANSFER PRICING

Bespoke advice.
Documentation.
Strategic advantage.



Dynamic tax landscape and significant policy developments

Transfer pricing has gone through a seismic shift in recent years. It has been a key area of focus of the OECD's Base Erosion and Profit Shifting ("BEPS") initiative. Tax authorities around the world have also become increasingly aggressive which poses a big challenge to the multinationals.

Local and regional rules and regulations are fast changing, for example, HMRC's introduction of transfer pricing documentation rules and subsequent guidance on compliance risks, EU's adoption of pillar 2, OECD Amount B, and adoption of BEPS Action 13 by many new jurisdictions. These changes make it increasingly onerous for multinationals (of all sizes) that do not have a robust transfer pricing policy, defensible transfer pricing documentation and a comprehensive controversy strategy.

At Menzies, we work as your partner through your transfer pricing journey. We provide bespoke advice to our clients across the full end-to-end transfer pricing life cycle.

Transfer pricing solutions

For companies that are at an initial or advanced stage, or are contemplating international expansion, it is critical to have a pragmatic, flexible and defensible transfer pricing structure so transfer pricing can become an enabler in their global journey rather than an impediment. Supply chain and value chain restructuring, increased use of technology, transfer of intangibles and people movement due to Brexit and post-pandemic business realignment are leading to more nuances in globalised business models and an increasing number of related party transactions.

Transfer pricing life cycle

01



Assess

- Impact assessment
- Risk review
- Due diligence
- Substance review

02



Design

- Policy design
- Value chain optimisation
- Acquisition restructuring
- Post merger integration

05



Sustain, defence & dispute resolution

- Audit defence
- Mutual Agreement Procedure (MAP)
- Advance Pricing Agreements (APA)

04



Document

- Documentation (Local & Master files, and *may be* CbCR)
- Summary audit trail
- Local transfer pricing forms

03



Implement

- Intercompany agreements
- Monitoring
- True up / down



Our services

We offer end-to-end transfer pricing services, helping businesses manage risks, enhance compliance, and optimise their transfer pricing strategies. Our services include:

Risk review & health check

We conduct in-depth fact-finding/ validation discussions with the business to assess the appropriateness of the existing transfer pricing policy, identify potential risks, and provide actionable recommendations. Our goal is to strengthen your existing transfer pricing policy, ensuring it is both compliant and fit for purpose.

Transfer pricing advisory

We provide expert guidance on complex transfer pricing matters, including the transfer pricing implications of business restructuring, intangibles migration, and other intricate transactions. Our advisory services help businesses navigate regulatory complexities while maintaining compliance.

Transfer pricing policy design & implementation

Using insights from risk reviews, benchmarking analysis, and industry best practices, we assist in developing a robust and consistent transfer pricing policy with continued focus on aligning transfer pricing outcomes with substance and value creation. We also support seamless implementation of the transfer pricing policy to minimise administrative burden.

Let us help you optimise your transfer pricing strategy and stay ahead of evolving transfer pricing landscape.



Transfer pricing documentation & benchmarking

We help businesses meet their UK and global transfer pricing documentation obligations by preparing defence ready local documentation.

We license necessary databases and software tools to perform all benchmarking analysis to prepare our advice.

Controversy & dispute resolution

We provide strategic support and solutions to help manage dispute risk. When tax authority challenges arise, we help your business respond with detailed responses underpinned by thorough analysis and manage negotiations.

We also have extensive experience in supporting clients and negotiating with tax authorities on complex Advance Pricing Agreements (APA) and Mutual Agreement Procedures (MAP) between tax authorities.

Benefits of choosing Menzies

Our approach: strategic and bespoke

We take a forensic approach to understanding your business model and key performance drivers, ensuring that your transfer pricing aligns seamlessly with commercial realities. This not only optimises compliance but also serves as the strongest defence against scrutiny from tax authorities.

Global coverage

We are part of a global network of transfer pricing professionals from HLB member firms around the world who offer experienced local resources and essential local knowledge within a global framework, allowing us to formulate tax-efficient, commercially viable transfer pricing strategies, prepare global documentation and efficient support on dispute resolution.

Let us help you optimise your transfer pricing strategy and stay ahead of the evolving transfer pricing landscape.



“I had a great experience with the Menzies TP team which I was very confident would be the case, having used Menzies on other projects over the years. The TP team were great at collecting information and made the process very straight forward. TP advice and report is a new area for us, as we grow as business, and Menzies were able to make the entire process collaborative and understandable to ensure the best outcome for us.

The team members were very supportive and thorough in their work. The report that was produced is a great review of our business and shows a clear method for us to work from in order to adhere to all technical and relevant TP requirements.

I would absolutely recommend Menzies for TP advice and other services. The approach Menzies have is one of support, collaboration and engagement, where they really feel like an extension of our team. They provide excellent knowledge, guidance and expertise in all that they do.”

Greg Baxter, Chief Operating Officer
Interlink Online Limited

Support with transfer pricing

We recognise the challenges you face in getting transfer pricing right. Our approach is pragmatic, tailored to your business's unique needs, and focused on delivering practical solutions. To learn more about how we can support you, feel free to get in touch.



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"We worked with the team at Menzies to formulate a cost effective plan for them to provide us with a Transfer Pricing study at relatively short notice, to fit in with our need to incorporate the results of the Study into our latest financial reports. Their approach was pragmatic, cost efficient and quick, resulting in a great solution for us. The team we dealt with were responsive, explained the various options and outcomes facing us as a business and were always on hand to help and offer advice. I would recommend Menzies to other businesses."

Russell Cullens, Chief Financial Officer
ESP Global Services

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BRIGHTER THINKING

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