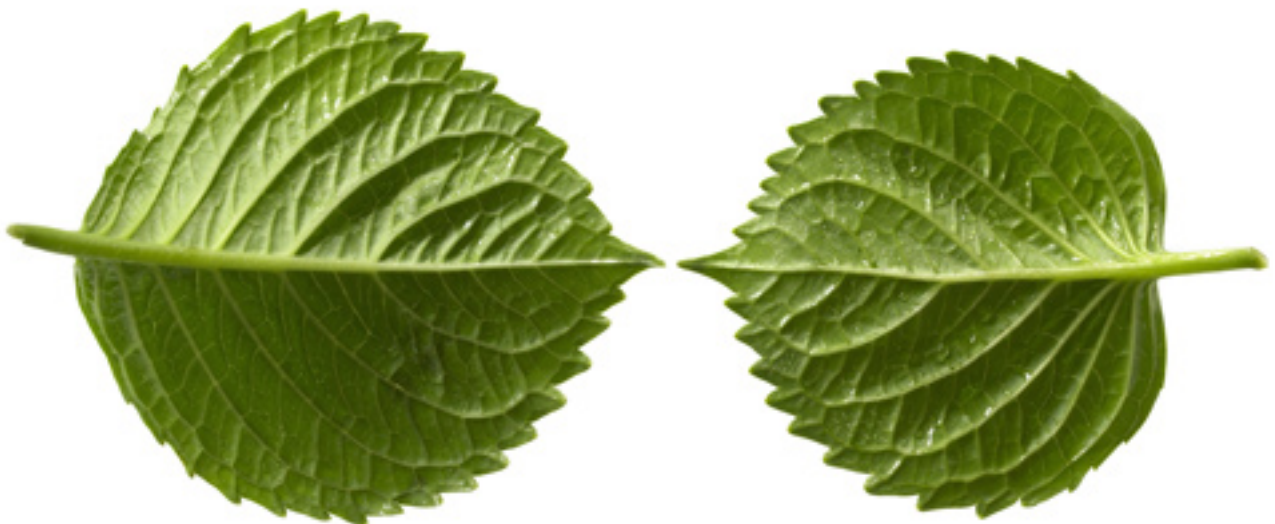


Coming together across
borders to deliver value
New Global Transfer
Pricing Center



A fresh approach

Deloitte member firms (Deloitte) are pleased to announce a new transfer pricing service offering. In conjunction with Deloitte India, the Deloitte transfer pricing teams are introducing a low-cost documentation service to meet the effects of rising compliance costs in today's competitive market. High quality transfer pricing documentation can now be designed and delivered using the resources of Deloitte India's Global Transfer Pricing Center (GTPC).

Meeting your needs

Multinationals are operating in an environment of unprecedented complexity and economic difficulty. The rising volume and variety of intercompany transactions combined with increasing documentation requirements means that transfer pricing is one of the leading international tax issues facing global business today.

A robust and efficient compliance practice is essential to help avert revenue authority scrutiny, potential adjustments and penalties. Tax authorities are imposing stricter penalties for non-compliance; coupled with the escalating costs of inquiry defence, the financial consequences of non-compliance are now more onerous than ever before.

Selecting the right approach to manage global transfer pricing compliance means gaining important efficiencies and consistencies, but without an increase in transfer pricing audit risk. Consolidating multinational compliance activities enables a centralized approach to achieve comprehensive control and consistency, cost savings, and more uniform and efficient processes.

How Deloitte can help

As an international professional network of member firms, Deloitte is the right organization to work with you to build such a process and deliver the integrated, efficient, and value-driven global transfer pricing services you require. This capability is complemented by a detailed local knowledge and an understanding of compliance requirements – including country by country rules for documentation and comparables studies.

In moving elements of the production of compliance documentation to India, substantial cost savings can be generated through reduced labor costs. Deloitte India's Global Transfer Pricing Center can provide assistance using centralized documentation tools for cost effective compliance. Documentation will be prepared by a multi-disciplinary engagement team comprised of Deloitte transfer pricing professionals with backgrounds in economics, accounting and management.

Deloitte's role will be to provide the advice and consultation necessary to deliver a custom package reflecting your individual requirements in a timely and cost effective manner.

A global approach that is tailored, collaborative, committed, and value-driven.



Compliance issues

Appropriate and consistent implementation of transfer pricing policy will help avoid penalty charges, provide direct tax savings and mitigate tax risk.

Standardization of transfer pricing compliance procedures and documentation creates organizational efficiencies which directly translate into reduced compliance costs. However, with dramatically differing territorial compliance requirements, significant database subscription fees and associated staff costs, efficiency gains can be surrendered when producing global documentation in-house or through external advisors. Deloitte's offering mitigates these factors by outsourcing the physical production of global compliance documentation to Deloitte India's GTPC.

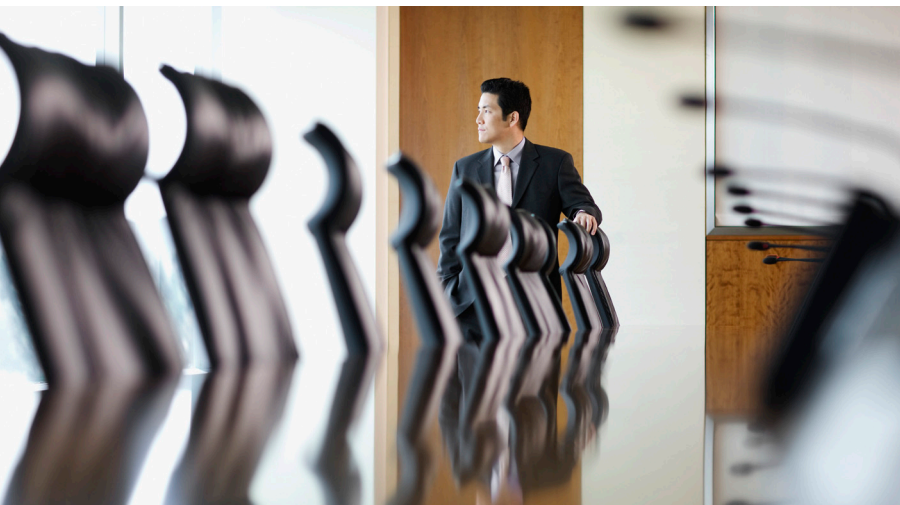
Deloitte's offer

This new compliance outsourcing offering can include:

- Advice on the design, structure and management of transfer pricing documentation.
- Preparation of functionally distinct master documents for different regions, individually tailored to meet local country requirements. This balanced approach accommodates requirements for local comparables with the benefits of a centralized compliance framework in a cost effective manner.

- Enhanced documentation capabilities with access to multiple databases and the tools for identifying explicit entity types such as toll manufacturers, low risk distributors, and service providers.
- Project management and monitoring by Deloitte senior staff who will liaise directly and on your behalf with Deloitte India professionals.
- The GTPC can help develop your in-house competency to manage your transfer pricing needs

“More than mere documentation, but instead a centrally coordinated process that will deliver information, efficiencies, and value through transfer pricing.”



Meet the teams

Deloitte is proud to introduce the team that will be responsible for delivering this new global transfer pricing compliance service offering.

Dr. Shanto Ghosh
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Dr. Ghosh received his Ph.D. from Boston University and Master's degree from the Delhi School of Economics. He has over ten years of consulting experience ranging from issues in international transfer pricing, valuation, corporate finance and organizational design. Dr. Ghosh has taught at the Harvard Institute of International Development and lectured at Boston University and at the University of California, Berkeley.

As a transfer pricing economist, Dr. Ghosh has published his articles in numerous journals and brings extensive experience of defence, planning and documentation studies involving clients from the technology, pharmaceutical and financial services industries.

Parikshit Datta
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Parikshit is a graduate in Economics and a Chartered and Cost Accountant with over eleven years of experience in various aspects of transfer pricing in India and abroad. Parikshit has been involved in the implementation of contract/ toll manufacturing, contract R&D and limited risk distribution models, managing transfer pricing issues in permanent establishment situations, planning of optimal profit models for Indian outbound MNEs, supply chain restructuring and tax audit defence.

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