



What we do

 Working with you to give you visibility and oversight throughout the process

 Robust and proactive advice that fits your commercial needs and business goals

 Depth and breadth of skills across all areas of TP controversy

Dispute Prevention







-  Bilateral and multilateral Advance Pricing Agreements
-  Advanced rulings and unilateral Advance Pricing Agreements
-  Pre-transaction engagement with tax administrations
-  Ongoing proactive engagement with tax administration e.g. International Compliance Assurance Programme
-  Planning and preparation to minimise the impact of disputes by developing global strategic TP controversy-aware TP policies and documenting evidence.

Dispute Resolution






-  Transfer pricing enquiry handling and closure
-  Global enquiry process tracking
-  Interaction with tax administrations
-  Analysis, economic and technical support
-  Appeal and litigation support
-  Mutual Agreement Procedure and arbitration support

Transfer pricing controversy lifecycle

Breadth of skills

-  Process insight
-  Accounting, legal and economics
-  Treaty and OECD expertise
-  Tax technical
-  Forensic accounting and automated data interrogation
-  Technology to support processes and controversy management

Network & reach

-  Experienced teams with backgrounds drawn from economics, tax administrations and industry in the Deloitte network
-  Transfer pricing services in 69 countries
-  Global coordination on disputes
-  Consistent global approach
-  Industry and geography specialists

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