

Overview

Global operations mean global opportunities. But they also mean exposure to taxation by multiple tax authorities, each hungry for revenue in an uncertain global economy. Thoughtful, proactive, sustainable transfer pricing solutions are a necessity as you seek to manage your global tax costs.

Tap into Dentons' many years of experience in assisting companies like yours to plan, implement and defend transfer prices. Our team designs transfer pricing strategies, and we prepare reports that present and document the arm's-length nature of intercompany prices between related parties. We can represent you in direct negotiations around the world and can help you achieve certainty by obtaining advanced pricing agreements on your behalf. If your company's transfer prices are challenged by the tax authorities, our Tax Litigation group can help you in defending them, negotiating a favorable settlement, or litigating the matter through the courts.

Whether you're moving money across the country or around the world, count on our Transfer Pricing team to help you get it there safely.

Representative Experience

- **Canadian taxpayer:** Advising on a transfer pricing case involving a large Japanese lumber distributor and its Canadian subsidiary in respect of whether the subsidiary was charged a fair market value price for its services, taking into account the CUP and TNMM methods.
- **Multinational dairy products corporation:** Advising and assisting the second largest dairy products group in the world and the second largest food products group in France on all tax aspects of its acquisition policy across Europe with special focus on the markets in Germany, France and Poland. Among the different specific services, our tax lawyers mainly focused on tax structuring work, an in-depth tax due diligence, financing schemes and Transfer Pricing schemes.
- **Europe-based original equipment manufacturer and aftermarket automotive supplier:** Advising on the massive refinancing of over \$14 billion of debt related to a recent acquisition. We created the most tax advantageous structure for our client and continue to find business oriented solutions for the client in connection with the refinancing of the capital structure, while guiding our client to avoid transfer pricing adjustments, and ensuring regulatory compliance.