



TRANSFER PRICING ANALYZER

The pace of change for transfer pricing (TP) is accelerating. As the OECD/Inclusive Framework BEPS recommendations are increasingly adopted into national laws, ever-changing and tougher TP requirements and stricter enforcement place increased burdens on companies with international operations. Companies are struggling to keep up. According to a Deloitte survey, an average of 60% of global companies with over \$1B in revenue are not satisfied with their current transfer pricing strategy or believe there is room for improvement. Companies are looking to minimise risk by developing a more cohesive approach to their entire TP function and by improving the efficiency of their processes.

You can increase productivity, manage risk and minimise cost with Thomson Reuters Checkpoint® Transfer Pricing Analyzer (TPA). Develop transfer pricing expertise and insight with our comprehensive overview and comparison of TP regulations across 108 jurisdictions, as well as all relevant international guidelines. TPA includes references to the laws, regulations, relevant treaty articles, commentary and current awareness news to help you maintain a clear picture of transfer pricing rules applicable to your business. Collect data for a FAR analysis or assess the BEPS positions for group entities, and build out a transfer pricing analysis from a regulatory standpoint.



Maximize Value and Productivity

Provide insight and value to your team as the transfer pricing expert. With TPA, you can efficiently research and compare TP regulations across various jurisdictions. The links to regulations, treaties and forms provide references to government source documents, the commentary provides color and perspective from TP experts and the news provides updates on any changes.

Build out the regulatory framework for a transfer pricing analysis to assess compliance with the regulatory side of transfer pricing. This will help determine if your present transfer pricing data analysis is sufficient or whether a new comparable data study is needed for your intercompany transactions.

Manage Risk

Provide a FAR or BEPS analysis of your

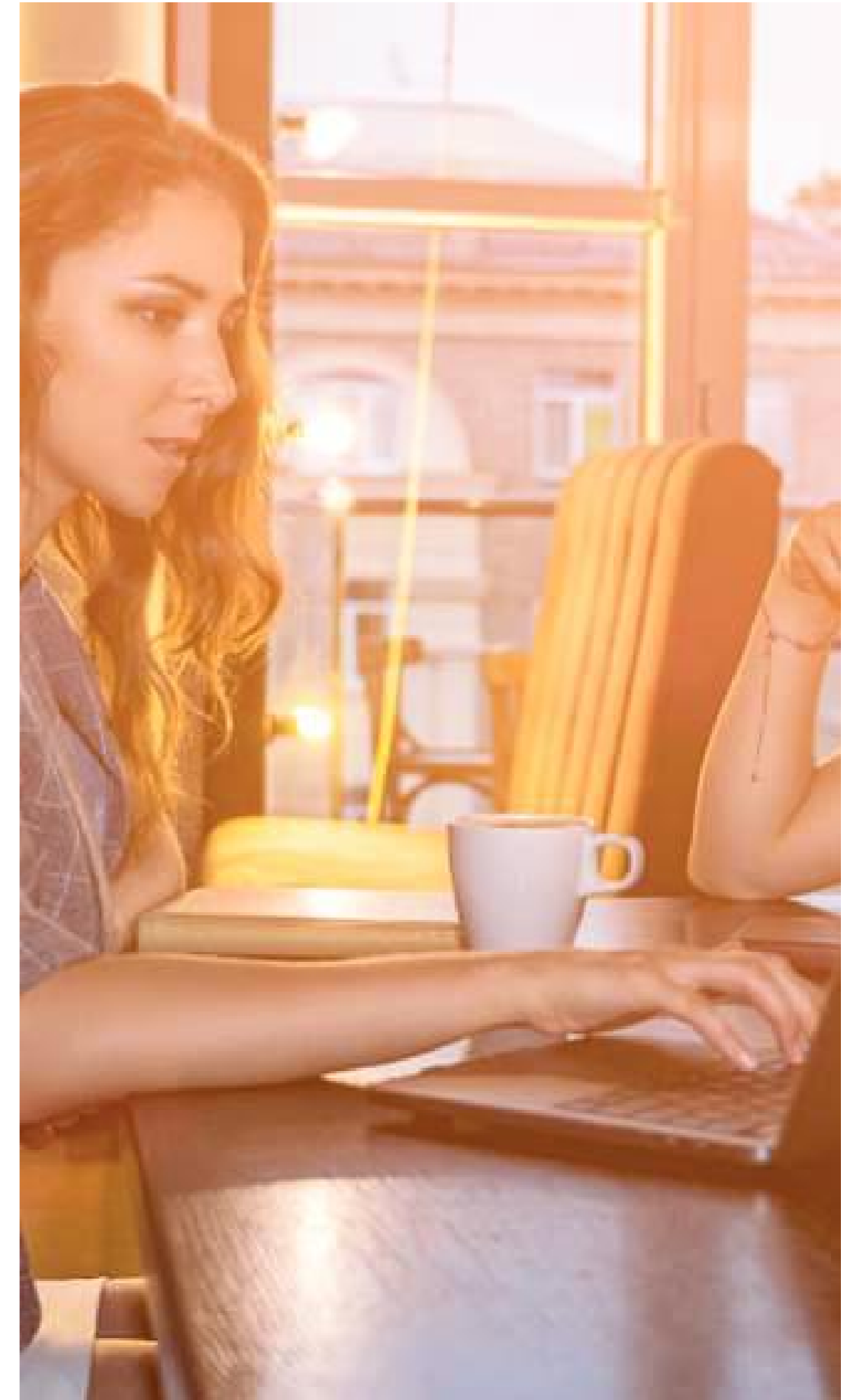
company to identify any areas of risk and proactively address areas where you may need to be more prepared.

Monitor existing and changing TP requirements with various news updates aggregated from expert sources in international tax. Retain your research results and analyses in the Projects area of TPA for future reference and maintain a picture of transfer pricing obligations across the jurisdictions in which you operate.

Minimise Cost

Build an integrated TP strategy by having a centralized overview and understanding of local regulations and requirements for each of your subsidiaries.

Develop the skills and expertise needed to maintain control of more knowledge and planning in-house, while working more efficiently with your advisors.



Countries Covered:

Albania	Cyprus	Israel	Namibia	Slovak Republic
Algeria	Czech Republic	Italy	Netherlands	Slovenia
Angola	Denmark	Jamaica	New Zealand	South Africa
Argentina	Dominican Republic	Japan	Nicaragua	Spain
Armenia	Ecuador	Jordan	Nigeria	Sri Lanka
Australia	Egypt	Kazakhstan	Norway	Sweden
Austria	El Salvador	Kenya	Oman	Switzerland
Azerbaijan	Estonia	Korea (Republic of)	Pakistan	Taiwan
Bangladesh	Ethiopia	Kuwait	Panama	Tanzania
Belarus	Finland	Latvia	Papua New Guinea	Thailand
Belgium	France	Lebanon	Paraguay	Turkey
Bolivia	Georgia	Liberia	Peru	Uganda
Botswana	Germany	Lithuania	Philippines	Ukraine
Bosnia and Herzegovina	Ghana	Luxembourg	Poland	United Arab Emirates
Brazil	Greece	North Macedonia	Portugal	United Kingdom
Bulgaria	Guatemala	Malawi	Puerto Rico	United States
Canada	Hong Kong	Malaysia	Qatar	Uruguay
Chile	Hungary	Malta	Romania	Venezuela
China	Iceland	Mexico	Russia	Vietnam
Colombia	India	Mongolia	Saudi Arabia	Zambia
Costa Rica	Indonesia	Morocco	Serbia	
Croatia	Ireland	Mozambique	Singapore	



108

Jurisdictions Covered

TPA Components

Transfer Pricing Analyzer incorporates all the elements needed to help you get a full understanding of transfer pricing obligations across the relevant jurisdictions you operate in.

Home: A user sensitized page that links to the user's ongoing projects, reflects search preferences, provides tutorials, links to international tax briefs and relevant government websites.

Information: Assessment and comparison of transfer pricing components across 108 jurisdictions, including the documentation requirements, the methods used, comparable data information and more — plus you can also evaluate the jurisdictional regulations against international guidelines from the UN, G20/BEPS, OECD and EU.

News: Aggregation of transfer pricing and related international tax news from a variety of expert sources so you can stay updated on the latest changes.

Forms: Documentation relevant to the TP workflow for each of the 108 jurisdictions, including forms for reporting transactions with related parties, applications for APA, compliance with documentation requirements and claims to double tax treaty benefits.

Regulations: Actual laws related to TP including tax codes, decrees, circulars and more, so you can reference government-sourced information.

Treaties: Relevant article sections of treaties for each jurisdiction related to TP issues such as competent authority, TP adjustments, exchange of information and more.

Commentary: Explanations of the various transfer pricing rules for each jurisdiction, including references to relevant case laws and special areas for consideration.

Tools: Data collection of your company's activities related to the FAR analysis and for BEPS risk assessment from a question bank, as well as document templates for license agreement patents, inter-company services agreements and more.

Analyzer: Step-by-step process to build out the regulatory requirements portion of a transfer pricing analysis with guidance from relevant TP regulations on the side panel as reference.

Projects: Storage and history of your documentation and maintenance of document trails created on the platform.



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