

BarZvi & BenDov

LAW OFFICES

Transfer Pricing
Associates

THE TRANSFER PRICING PROCESS

YOUR BRIDGE TO WORLDWIDE TRANSFER PRICING SERVICES

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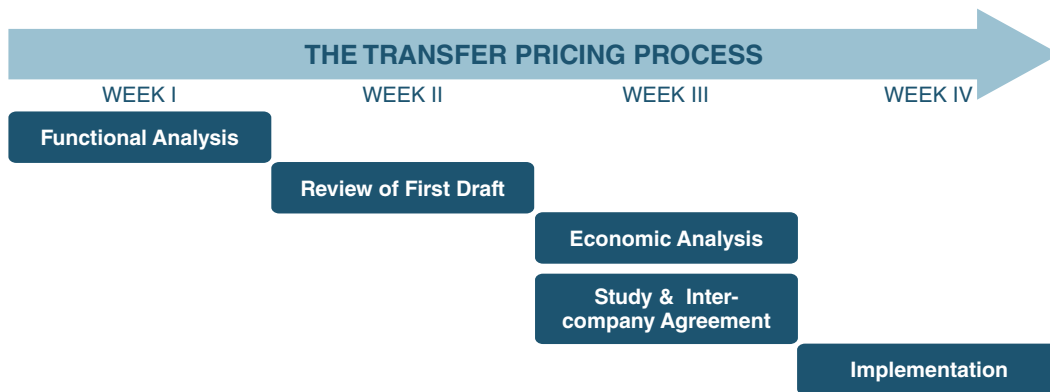
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THE TRANSFER PRICING PROCESS

Transfer pricing is sometimes perceived as a too-complex process, which may hinder the Multi National Enterprise's (MNE) financial standings and/or tax benefits. However, Bar-Zvi & Ben-Dov's experts have developed a transfer pricing process which is accessible, understandable, and easily implemented by the client without jeopardizing its other financial standings.

Although a large number of MNEs have devoted considerable time and efforts to transfer pricing documentation and dispute resolution strategies, few have made an explicit connection between their business and operational model and the transfer pricing method they apply. Making such a connection allows a multinational to align its transfer pricing system with its business models based on sound economic arguments, and at the same time develop the arguments needed to justify and defend the transfer pricing policy towards internal and external stakeholders, e.g. subsidiary companies, internal and external auditors, potential investors, and naturally the tax authorities in all the countries where the MNE is operating.

The transfer pricing process of documenting, analyzing, and defending the transfer pricing of an MNE, typically requires four weeks, as demonstrated below. However, pending the availability of the MNE's personnel, the process can be finalized even earlier.



TRANSFER PRICING DOCUMENTATION CREATES A BUSINESS OPPORTUNITY

Having over ten years of experience in this field, both in-house and as external experts, and as part of the multinational Transfer Pricing Associates network of independent transfer pricing experts, we are able to provide your company with transfer pricing solutions and documentation that will be applicable in any jurisdiction in which it operates.

We see transfer pricing as creating a business opportunity for the company (a tax opportunity, among others), and enabling the company's management to acquire an insight into the company's activity and pricing, which is otherwise overlooked.

ABOUT US

Bar-Zvi & Ben-Dov is a boutique law firm specializing in transfer pricing and corporate law. Our experts have both legal and financial backgrounds, and held high ranking financial positions in private and public companies. Bar-Zvi & Ben-Dov are the Israeli partners in the global Transfer Pricing Associates network, which encompasses partners in more than 40 countries, and are thus able to provide services all around the globe, with local sign-offs where required. The firm prides itself of its unparalleled 100% success rate in tax audits worldwide.

For more details, please visit: WWW.TRANSFERPRICING.CO.IL and WWW.BBL.CO.IL

THE TRANS- FER PRICING PRO- CESS

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