

# TRANSFER PRICING

## Taxation Services





# BE PREPARED FOR TRANSFER PRICING CHALLENGES

**In today's global economic environment, tax authorities around the world are very much focused on protecting their tax base, especially in the post-COVID-19 pandemic world. As compared to the last decade, the attention of tax authorities have diverted to the area of transfer pricing, resulting in a surge of numerous court cases, some involving Fortune 500 companies.**

These cases have helped shaped the changes to the development of transfer pricing regulations and guidance globally. The proliferation of transfer pricing documentation requirements and penalties are now more visible than before. Additionally, with the evolvement of the Base Erosion and Profit Shifting ("BEPS") initiative, complexities surrounding transfer pricing planning and compliance have been amplified. In addition, the lack of transfer pricing guidance leaves taxpayers vulnerable to potential transfer pricing challenges resulting in adjustments to the income subject to tax or deductions on expenses from tax authorities.

Given the foregoing, it is imperative for businesses today to take proactive actions towards robust transfer pricing planning and compliance for their related party transactions, regardless of whether these transactions are purely domestic and/ or involving cross-border related parties. These actions will not only help businesses manage potential transfer pricing queries from tax authorities, but also mitigate the tax impact arising from surprising transfer pricing adjustments.

## WHY CCS

Through our own considerable experience and a global network of associated firms, we have the resources to assist you with the complicated transfer pricing planning opportunities and compliance with tax authorities from both Singapore and other tax jurisdictions.

### YOUR INDUSTRY IS OUR INDUSTRY

Our team comprise of experienced tax professionals with broad knowledge and understanding of optimal solutions. We serve clients across diverse industries. We continuously develop and enhance our multi industry expertise to provide you with tailored services and solutions to suit your transfer pricing needs.

We have assisted clients ranging from private sectors to large multinational groups in industries such as shipping, logistics, oil and gas, aviation, technology, telecommunications, pharmaceuticals, media and entertainment etc.

### WHAT WE CAN DO FOR YOU

There is no one-size-fits-all solution in the transfer pricing environment. With the recent developments, transfer pricing has become ever more challenging and complex. Our team recognises that transfer pricing needs and compliance shall be unique to each organisation, industry, transaction and jurisdiction. We are committed to understanding your transfer pricing concerns to create value and achieve business goals.

We do this through a no obligations overview of your current positions and provide you with delivery recommendations suited to the prevailing circumstances before the commissioning of engagements.

## OUR SERVICES



### PLANNING

Transfer pricing planning may be an arduous task but it does not have to be that way. With the right approach, it can unveil opportunities to identify problem areas, rethink, realign and optimize business strategies.

- Transfer Pricing Strategy
- Benchmarking Analysis
- Financing Arrangement



### COMPLIANCE

The authorities have been putting strong emphasis and focus on transfer pricing principles. A simple solution is to comply with their requirements and we can help with that.

- Singapore Transfer Pricing Documentation
- Base Erosion Profit Shifting (“BEPS”) and Country-by-Country Reporting (“CbCR”)



### DISPUTE RESOLUTION

Audit issues, double taxation and litigation comes with a hefty price. It is always good to be prepared with strategies and effective responses.

- Advance Pricing Arrangement (APA) and Mutual Agreement Procedure (MAP)
- Transfer Pricing Controversy

### CCS TAXATION SERVICES

As a business owner, every transaction you plan to make may have direct or indirect tax consequences.

To achieve tax efficiency so as to enhance your return on investments, it is advisable that various tax issues be considered alongside the planning and structuring of your business.

The tax landscape is changing at a rapid pace and expert advice is essential to mitigate tax risk and maintain profitability. We can assist you through our comprehensive tax compliance, tax advisory and transfer pricing services to minimise your effective tax burden.



## COMPLETE CORPORATE SERVICES

Complete Corporate Services is a leading integrated business solution provider of more than 30 years standing. Our associates are in 558 offices and 114 countries around the world. Working in parallel with your businesses objectives, our corporate solutions and innovative technologies enable you to maximise your capabilities for sustainable growth. Dedicated in the work that we do, our team of qualified professionals will work with you to ensure quality, effective and efficient service delivery.



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