

VSTN CONSULTANCY

**Global Transfer Pricing Documentation –
A strategic Investment for MNE**



What is Global Doc?

- » Global doc is a structured set of documents, maintained entity-wise to justify the arm's length nature of the intra-group transactions, ensuring compliance across jurisdictions.
- » A professionally structured global documentation is suitable for internal analysis and external consumption by stakeholders.
- » A well-prepared global transfer pricing document also supports mutual agreement procedures (MAPs) or advance pricing agreements (APAs)



Context & Considerations

- » Do you operate in more than 2 countries?
- » Are your intra-group transactions carried out at Arm's length Price?
- » Does your company maintain appropriate transfer pricing documentation in adherence with the respective local laws?
- » Is your document prepared only with one sided understanding of the country laws?
- » Does your document which is compliant as per your local country laws create challenges in the counter party jurisdiction?
- » Is the information presented in various countries' documentation in alignment with each other?
- » Is your transfer pricing document consistent, defensible and reduces the risk of audit exposure, fines, and reputational damage?



Maintenance of Global documentation is the key to align your transfer pricing policies with the companies' business strategies

Why Unified Global Doc Matters

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- A** Avoids Double Taxation
- R** Reduces tax controversies and related penal consequences
- M** Maintains symmetry with Master File and CbCr
- S** Supports Advance Pricing Agreements (APAs) and Mutual Agreement Procedures (MAPs)
- L** Local files aligned with company's global strategy
- E** Ensures compliance with local tax regulations
- N** Navigate complexities in regulatory landscape
- G** Global cash flow management
- T** Tool for improving tax efficiency across jurisdictions
- H** Helps align pricing policies
- P** Proactive management and Planning
- R** Risk management
- I** Identify blind spots in global transfer pricing strategies
- C** Consistency in documentation amongst the group entities
- E** Evidence and Proof to substantiate the intra-group transfer pricing policy

Stay Protected & Stay Compliant

- » Global doc isn't just about compliance - Having a globally organized and centrally managed approach to transfer pricing documentation also helps to identify planning opportunities for your business.
- » Global doc is an investment to mitigate transfer pricing litigation.
- » The cost of non-compliance outweighs the cost of getting it right.

Looking out for a trusted partner in preparing your global doc?
Contact our transfer pricing specialists at www.vstnconsultancy.com

Why VSTN?

- » Experience of preparing documentation for more than 17 countries across the globe
- » Access to all major global databases like Moody's Orbis- TP catalyst, Moody's -EDFX , ktMINE, Thomson Reuters Onesource, Royaltyrange, Prowess
- » Highly experienced professionals with culminative TP experience of 100+ years
- » Awarded as the Best Newcomer in Asia Pacific – 2024 by International Tax Review (ITR)
- » Recognized as one of the finest performing transfer pricing firms by ITR
- » The core team has visibility of various countries TP norms as we work across multiple country TP regulations thereby enabling us to be able to provide TP advisory and solutions wholistically.

Countries covered by VSTN so far



ABOUT US

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- » VSTN Consultancy is a boutique Transfer pricing firm with extensive expertise in the field of international taxation and transfer pricing. VSTN Consultancy has been awarded by **International Tax Review (ITR)** as **Best Newcomer in Asia Pacific – 2024** and is recognized as **one of the finest performing transfer pricing firms**.
- » Our offering spans the end-to-end Transfer Pricing value chain, including design of intercompany policy, drafting of Interco agreement, ensuring effective implementation of the Transfer Pricing policy, year-end documentation and certification, Global Transfer Pricing Documentation, BEPS related compliances (including advisory, Masterfile, Country by Country report), safe harbor filing, audit defense before all forums and dispute prevention mechanisms such as Advance Pricing agreement.
- » We are structured as an inverse pyramid where leadership get involved in all client matters, enabling clients to receive the highest quality of service.
- » Being a specialized firm, we offer advice that is independent of an audit practice and deliver it with an uncompromising integrity.
- » Our expert team brings in cumulative experience of over 100+ years in the transfer pricing space having worked with multiple Multinational Companies across sectors/industries in the Big 4 and have cutting edge knowledge and capabilities in handling complex TP engagements.



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