

# ONESOURCE TRANSFER PRICING

Risk Assessment: BEPS Focus



## A Strategic Approach to BEPS Planning

Multinational enterprises and governments are bracing for international tax reform as the OECD spearheads the Base Erosion and Profit Shifting (BEPS) initiative. With BEPS implementation expected by 2017, multinational enterprises are currently examining their transfer pricing documentation and planning needs. Due to the financial and reputational risks of non-compliance, the need for a BEPS strategy is paramount.

Thomson Reuters ONESOURCE Transfer Pricing is pleased to introduce the Transfer Pricing Risk Assessment: BEPS Focus to assist your organization in creating a strategic plan for your transfer pricing planning and documentation. Multinational enterprises across several regions and industries worldwide trust our team of economists to meet their transfer pricing documentation and planning needs. With this experienced team and unique ONESOURCE solution, you will gain the insight necessary to build a coordinated plan for BEPS, particularly Action Items 8, 9, 10 and 13.

### TRANSFER PRICING ISSUES PRESENTED BY BEPS

BEPS is an initiative that stems from an increased demand for tax transparency. As global operations continue to expand, tax authorities seek to close gaps and implement new international reporting standards. The following are main transfer pricing issues presented by BEPS:

- Increased demand for transparency.
- Potential increase in audit frequency.
- New international reporting standards / requirements.
- Misalignment of supply-chain / value-chain.
- Misallocation of risk.
- Inconsistent transfer pricing policies.



### WHO WE HELP

BEPS is a daunting challenge which will require global coordination. While implementation of BEPS may seem years away, organizations must plan now to ensure compliance. With the Transfer Pricing Risk Assessment: BEPS Focus, we assist organizations that:

- Anticipate potential risk in their current transfer pricing structures.
- Have relatively complex transfer pricing structures.
- Have been involved in significant M&A activities.
- Have recently migrated intangible assets over international borders.
- Want to be ahead of the game.

### THE ONESOURCE APPROACH

With diverse insights, proven experience, and over 500 transfer pricing clients around the world, Thomson Reuters ONESOURCE Transfer Pricing provides an objective assessment that will assist in shaping your strategy in the evolving BEPS landscape. We will work with your team on the following process:

1. Scoping of project goals and limitations.
2. Gathering functional and financial information for relevant corporate entities.
3. Reviewing functional and financial information.
4. Proposing follow-up questions and / or functional interviews with key stakeholders.
5. Completion and delivery of memorandum.
6. Presentation and discussion of results and recommendations.

### DELIVERABLE

Upon completion of the Transfer Pricing Risk Assessment: BEPS Focus, our economists can produce a memorandum and presentation detailing the risk assessment's results. Our professional recommendations can include:

- Identification of risk exposure.
- High-level analyses of:
  - Supply-chain / value-chain vs. profit allocation.
  - Relevant entity financial information.
  - Transfer pricing policies vs. functional profile of relevant entities.
- Suggestion for BEPS three-tier reporting environment.
- Suggestion for best practices with respect to holistic transfer pricing approach.

**CONTACT US TODAY**



1-888-885-0206

[tax.thomsonreuters.com/transfer-pricing](http://tax.thomsonreuters.com/transfer-pricing)

[taxaccounting.onesourcesales@thomsonreuters.com](mailto:taxaccounting.onesourcesales@thomsonreuters.com)

