

Transfer Pricing

In today's environment, transfer pricing cuts across all aspects of driving value in a business. It is a key strategic tool that must be managed and implemented effectively.

That's where we come in. We do it right. With a combination of accountants, economists, and people schooled in business, we know how to work-out what drives value in a business and then put a price on it.

Our team of transfer pricing specialists brings a wealth of in-house, advisory, and tax authority experience. We focus on strategy and planning, providing solutions that are insightful, robust, and pragmatic. Whether you are undertaking a business reorganisation, expanding into new markets, adopting new business models, have assets that need valued or integrating an acquisition, we have the right team for you. Oh, and we implement too, so with a team of lawyers standing behind us we can do all the legal stuff as well in offices all around the world.

No agenda. No baggage. Just good advice.

Representative experience

Implemented a dual principal structure for a global beverage company with operations in over 30 countries, from feasibility to implementation.

Key contacts

Tom McFarlane,
London

H. Todd Miller,
Washington, D.C.

Lisette Lach,
London

Graham Poole,
London

Related practices

Tax

Advised on supply chain optimization and the creation of a single hub to house IP, procurement and sales related activities for a global business spanning multiple jurisdictions and over a hundred entities.

Advised on and implemented a Procurement Hub and IP Hub for a global food multinational, spanning over 15 jurisdictions and including negotiating with relevant authorities and legal entity restructuring.

Numerous consumer brand valuations for a LATAM group, including centralisation of same in a Principal company in Panama.

Numerous brand valuation on M&A transactions (examples include working for the seller and the buyer).

An extensive valuation exercise for a global medical devices and technology group that was undergoing an extensive legal entity restructuring program including valuations in over 10 jurisdictions.

Successfully negotiated a bi-lateral APA between Japan and the UK for a global semiconductor production group.

Helped a Japanese car manufacturer with a corporate tax and transfer pricing audit in Italy, and investigations of alleged tax offences on disregarding a commissionaire structure, and an alleged "hidden branch".

Conducted a strategic review of transfer pricing for a household goods group relating to procurement operations in Hong Kong and China, and advice on the approach to settling a long-standing dispute.

Provided a global telecoms group with an expert opinion regarding application of the arm's length principle to credit rating and loan pricing. Prepared report and response. Tribunal decision aligned with opinion.

Integrated three acquisitions into an existing centralized business model covering numerous jurisdictions.

Awards and rankings

- "Their grasp of commercial realities, the structures we have and our commercial drivers is very strong.",
Chambers UK, 2017

Latest thinking and events

Press Releases

Hogan Lovells welcomes the New Year with 27 new partner and 71 new counsel promotions

News

UK government plans to introduce a re-domiciliation regime

Press Releases

Hogan Lovells welcomes the New Year and 25 new partner and 60 new counsel promotions

Client Notes

HMRC's PDCF campaign continues – back to business

Insights

Double standards for the taxation of intra group financing

Analysis

Coronavirus (COVID-19) - Summary of key international tax measures