

# Transfer Pricing (TP) Litigation and Controversy

## Our services

We offer a full cycle service to help you manage your transfer pricing litigation case from prevention, management to resolution. Our approach is comprehensive and provides a full overview of the litigation strategies to be considered, scenario analyses and analytical outcomes, as well as procedures and costs.



## Dispute Management



### Prevention

- Transfer Pricing (TP) Documentation preparation, including defense Transfer Pricing files
- Preparation of global strategic TP litigation Group / Local policies
- Pre-transaction engagement with tax authorities (advanced pricing agreements (APAs))
- Ongoing proactive engagement with tax authorities



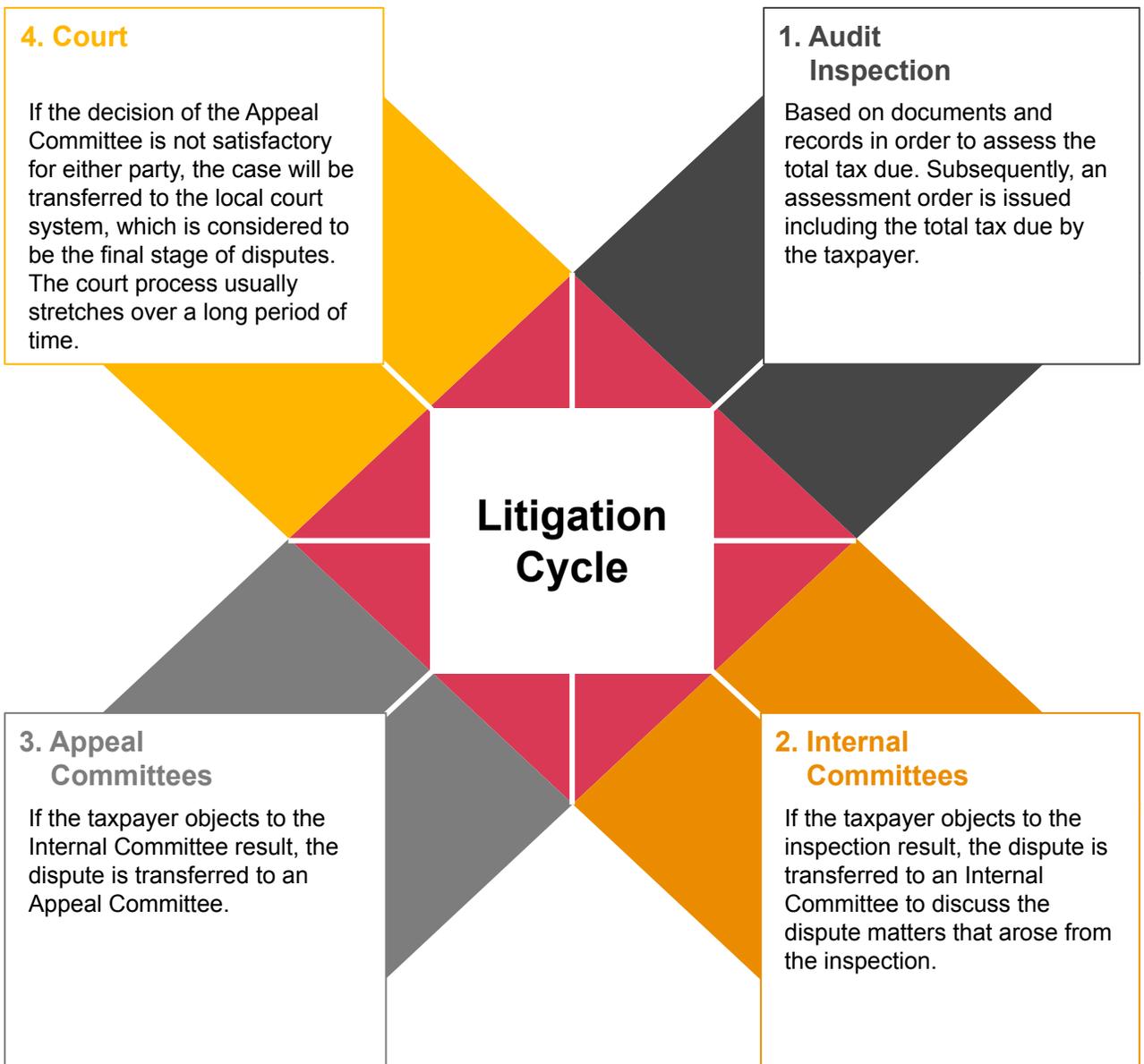
### Resolution

- TP inquiry handling and closure
- TP analytical, economic and technical support
- Negotiation with tax authorities
- Litigation support through administrative and juridical processes
- Mutual Agreement Procedure (MAP), arbitration negotiation and support



# Overview of the TP litigation process

A TP litigation cycle typically covers administrative, institutional and juridical stages. Our team helps you manage the TP litigation process through all the relevant stages until resolution of the case.



The PwC TP Litigation team offers comprehensive assistance through all stages of the TP litigation cycle to help you successfully progress through every stage.

## Let's talk

For a deeper discussion of how we can help you manage your transfer pricing litigation case from prevention, management to resolution, please contact us:



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## PwC has strong expertise in transfer pricing litigation in the Middle East

PwC Middle East TP litigation team consists of highly specialised experts with backgrounds in both tax law and economics as well as extensive experience in TP litigation and controversy from both developed and developing jurisdictions.

Our team has a highly successful track record in tax audit defenses and dealing with large tax appeal and tax litigation cases across the Middle East for large and mid-sized corporations from all industries.

We leverage strong long standing relationships with local tax authorities in the region and our team possess strong technical and linguistic skills (including standard Arabic) which enable us to assist you with any TP litigation / controversy scenario.