

Transfer Pricing

In today's environment, transfer pricing needs to be done effectively. It needs proper analysis and clear communication.

That's where we come in. We do it right. With a combination of engineers, 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. That allows us to provide solutions that are insightful, robust, and pragmatic. We implement too, and 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

Performed and documented a detailed value chain and functional analysis plus profit-split calculations to support a client's negotiations with a tax authority prelitigation.

Advised a UK-based multinational on historic thin capitalization, and modeled impact of new interest deductibility rules.

Designed and implemented a new brand licensing structure for a FTSE-100 company across its operations worldwide.

Advised a global business on supply chain optimisation and the creation of a single hub for IP, procurement and sales

Key contacts

Fabrizio Lolliri,
New York

Tom McFarlane,
London

H. Todd Miller,
Washington, D.C.

Lisette Lach-Reichle,
London

Graham Poole,
London

Related practices

Tax

related activities.

Conducted a critical review of a tax authority's profit-split model to support MAP negotiations, and helped develop alternative parameters for calculations.

Drafted expert opinions on a number of cases involving allegations of value-shifting through non-arm's length transfer pricing.

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

Hogan Lovells Publications

Double standards for the taxation of intra-group financing

Hogan Lovells Publications

Transfer pricing in the new global economy

Diversified Industrials: Horizons

Press Releases

Hogan Lovells Global Head of Transfer Pricing Relocates to New York

Blog Post

Approaches to valuing growth shares

Blog Post

Is it time for a review of your transfer pricing arrangements?

The potential impact of the HMRC Profit Diversion

Compliance Facility

Hogan Lovells Publications

HMRC introduces Profits Diversion Compliance Facility