


## TRANSFER PRICING

Any cross border transaction between two related parties is subject to transfer pricing provisions in India. Over the years, the Transfer pricing regulations are becoming increasingly complex. Last several years witnessed substantial litigation on Transfer Pricing related issues. Further, with the advent of Base Erosion and Profit Shifting (BEPS), the complexity of Transfer pricing would further enhance. Given this, it is imperative for businesses today to align their related party transactions with acceptable Transfer Pricing policies.

At Infiven Private Limited, we understand the complexity of transfer pricing. With rich experience and a global partner network, we provide end to end transfer pricing services to our clients. Our services encompass – transfer pricing planning for new related party transactions proposed, transfer pricing benchmarking and transfer pricing documentation (as statutorily prescribed) for all international transactions between related parties. Our teams also extend end to end litigation support as well on all transfer pricing matters. Many multinationals are evaluating the route of seeking an Advance Pricing Agreement for their related party transactions in India. Our experienced team and network partners, provide assistance in strategizing the APA, identifying the right approach for proposing the pricing for related party transactions as may be acceptable to the regulators, appropriate presentation of the application and representation of matter before relevant APA authorities.

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