



Transfer Pricing Services

Ryan provides a comprehensive suite of transfer pricing services that enable multinational businesses to proactively and efficiently manage the ever-changing global legislative and regulatory requirements and the growing potential for audit assessments. Our professionals address the business impact of cross-border transactions, as well as provide effective solutions that improve client profitability and reduce overall global tax liabilities by optimizing intercompany pricing from an operational and multinational tax perspective.

We understand our clients' business objectives and leverage our technical expertise in global transfer pricing principles to identify the proper balance in pricing cross-border transactions. Our ability to complement this expertise with our strategic approach and thorough understanding of international and value-added taxes ensures the highest level of value and delivery of client results.

Ryan's Transfer Pricing Services Overview

› Strategic planning and compliance

Ryan's transfer pricing services help multinational companies achieve business objectives while satisfying compliance and audit requirements. Our experienced professionals are uniquely qualified to provide transfer pricing studies and optimize intercompany pricing to support our clients' business objectives. We develop and analyze custom pricing structures and financial models that dramatically simplify our clients' compliance and reporting functions.

› Mergers and acquisitions (M&A) structuring (pre- and post-transaction)

Ryan identifies and addresses the transfer pricing implications and issues present in our clients' M&A transactions. We perform detailed due diligence reviews, examine the systems and process integration requirements, and provide proven post-merger integration and consolidation solutions.

› Intellectual property (IP) development and licensing planning

Ryan employs a unique business model for identifying hidden intangible value by leveraging our Firm's deep income tax expertise to bring enhanced IP solutions to our clients. These solutions incorporate cross-border licensing, research and development (R&D), and cost sharing of global intangibles while leveraging the Advanced Pricing Agreement (APA) or ruling approach, where appropriate, to enhance tax and financial reporting certainty.

› Intercompany financing solutions

Ryan has developed a low-cost methodology to efficiently provide documentation to support intercompany financing arrangements of all types. Our approach leverages accepted financial industry models and provides effective, global support for intercompany loans for all types of companies.

› Supply chain management planning

We understand that transfer pricing is one of the principal requirements for effective supply chain management. Ryan's "business first" approach to supply chain planning opportunities ensures that our clients' commercial objectives are coordinated with the right transfer pricing, value-added tax (VAT), customs, and international income tax planning strategies.

› Advanced pricing agreements

By proactively managing negotiations with local country and United States tax authorities, Ryan obtains up-front agreement on certain cross-border transactions and secures pricing for future years. This approach can provide clients with years of reporting certainty regarding the tax treatment of complex arrangements.

› Global audit support

Ryan provides transfer pricing, audit support, and audit defense to global clients across multiple industries worldwide. Our meticulous approach to managing global transfer pricing audits and examinations includes pricing analysis, as well as global dispute resolution and litigation support.