

Transfer Pricing Analyses



Starting point

Transactions between related parties must be settled at arm's length

Transfer pricing analysis is a key element of TP documentation which must be updated at least once every 3 years (or even annually if there are significant changes in the economic environment)

TPR forms report the results of controlled transactions. They are compared with the results of transfer pricing analyses

Understatements of the tax base and failure to comply with reporting obligations can result in criminal and fiscal sanctions



How can we help?

- We evaluate internal comparative data for its applicability in transfer pricing analysis and assist in preparing such analyses when possible
- We conduct analyses based on external comparative data from professional databases:
 - 1) QTPA / TP Catalyst – for commodity and service transactions
 - 2) Bloomberg / LSEG Eikon – for financial transactions
 - 3) Royalty Range / Royalty Source / Markables – for intangible and services transactions
- We prepare analyses for new / planned transactions (setting prices) or transactions subject to documentation requirements conducted in the past years (verification)

Benefits of working with CRIDO

Security: Based on our analyses, you can reliably assess the marketability of transactions, ensuring safety and peace of mind for board members and those responsible for tax obligations within the company

Formal compliance: We possess in-depth knowledge of the mandatory stages of analysis and prepare reports containing all the necessary formal elements required by Polish regulations (we also incorporate OECD guidelines, FCT recommendations and MF clarifications)

Professional support: We are an experienced team of 45 professionals who are well versed in the technical capabilities of the databases, the strengths and weaknesses of available analysis methods, and the ways in which the analyses can be challenged by controllers

Comprehensive range of services: We prepare transfer pricing analyses for any type of transaction



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