

## 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

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### Related practices

Business Structures

Tax

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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

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

### Hogan Lovells Publications

UK Tax Authority tightens the screws on tech companies