



Switzerland

Transfer Pricing Expertise

Our service offerings cover a broad range of transfer pricing/ tax expertise relevant for multinational companies with a nexus to Switzerland.

- Review and risk assessment of business operations/ models in light of BEPS.
- Analysis of inconsistencies of contractual framework to actual facts and circumstances, including:
 - value chain (risks, functions and assets);
 - processes;
 - intra-group transactions;
 - pricing method;
 - compliance status.
- Creation of substance-driven business models/ group tax structures as well as advice on implementation (i.e. intellectual property and financing structuring, supply chain optimization).
- Documentation:
 - preparation of Swiss local file based on OECD-compliant master file;
 - defending transfer pricing documentations against Swiss tax authorities in tax assessment process or tax audits;
 - negotiation of transfer pricing/ tax rulings as well as APAs with Swiss tax authorities.
 - Coordination of Country-by-Country Reporting Projects.
- Identification, quantification, management and monitoring of transfer prices and tax risks considering continuous BEPS developments.

Please contact us

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