



Transfer Pricing Services

“One client said their experience with the firm was ‘first in class,’ while another said: ‘Clayton & McKervey is an outstanding value. Great service, great price, and great experts. They provide me the best service for my dollar.’”

*International
Tax Review*

Clayton & McKervey has the specialized knowledge to help your company manage risks in a practical manner through strategic transfer pricing solutions. Our team has successfully defended many companies facing large tax adjustments and penalties through time-tested audit strategies. Clayton & McKervey has the practical knowledge to support your company’s global financial management strategies.

Transfer pricing is considered the most contentious tax issue for companies with cross-border operations. Intercompany prices charged on goods, services, royalties and loans all impact how much income tax is paid to each country. As the IRS and many other tax authorities are required to review transfer pricing as a part of every tax audit, multinational companies are increasingly facing transfer pricing questions.

Transfer Pricing Services

- » U.S. and international transfer pricing documentation
- » Transfer pricing planning & cash flow improvement
- » Transfer pricing audit defense
- » Transfer pricing comparable benchmarking
- » Advance pricing agreements
- » Transfer pricing due diligence

Transfer Pricing Team

Through the work of Principal Alex Martin, Clayton & McKervey was named one of the world’s leading transfer pricing firms by *International Tax Review*. He has more than 20 years of experience helping multinational companies navigate the transfer pricing requirements of more than 100 countries. Alex is supported by the firm’s highly experienced tax advisors. He regularly consults with accounting firms seeking U.S. or global transfer pricing experience.

International Tax Services

Our international tax team works to minimize the tax obligations of U.S. companies expanding abroad, and foreign companies establishing a presence in the U.S. Throughout our history we've provided clients with invaluable financial, operational and tax planning strategies. In addition, our international affiliations help our clients gain access to resources around the world.

- » Foreign tax credits
- » Permanent establishment
- » Interest Charge – Domestic International Sales Corporation (IC-DISC)
- » Repatriation of foreign earnings
- » Reorganization and entity structure
- » Treaty analysis

The Clayton & McKervey Difference

One of the benefits of working with Clayton & McKervey is our in-depth knowledge of the entrepreneur experience. Our firm has built its reputation on understanding the needs and challenges of businesses competing in the global marketplace. We can work with your team to develop and implement strategic transfer pricing solutions as part of a global strategy.

We regularly help companies reduce transfer pricing audit risks and identify cash-savings opportunities. For example, with our consultation one of our Canadian clients was able to increase utilization of losses in Canada by correcting the transfer prices on products sold to the U.S. subsidiary. We also prepared the transfer pricing documentation to support these changes. This strategic transfer pricing approach reduced the risks of an audit in Canada, and improved the company's cashflow and overall effective tax rate.

Contact Clayton & McKervey to learn how we can help.



Alex Martin

Principal

amartin@claytonmckerverey.com

248.208.8860



Suzanne Tuson, CPA, MST

Shareholder

stuson@claytonmckerverey.com

248.208.8860