

The background features a stack of silver coins in the center, with a grid and line graphs overlaid. A large blue diagonal bar is on the left, and an orange arrow points right on the right side.

transferpricingintelligence




About us

Transfer Pricing Intelligence (TPIntel) is a consulting firm specialized in **transfer pricing**, backed by more than 20 years of experience. Our firm is formed by a group of professionals who offer a different approach, based on personalized and punctual attention to our client's needs. We offer ideas of value, focused on generating tangible benefits by fulfilling our commitments and by being efficient in our processes.





We are focused on meeting the daily our client's needs in managing the transfer pricing life cycle of companies, which includes the following: planning, designing and implementing policies, intercompany pricing, preparing and reviewing the corresponding contracts, as well as the constant monitoring of its application, and the determination of adjustments, when needed, by preparing the supporting documentation in accordance with the current regulation, thus laying the technical foundations that strengthen the position of our clients in fulfilling their obligations in this area without neglecting the development of their business.



At TPIntel we are aware of the current fiscal environment in Mexico and worldwide, as well as, the relevance that transfer pricing audits have in the inspection activities by the Mexican tax authorities. That is the reason why, one of our main strengths is to rely on a multidisciplinary group of highly experienced specialists in risk identification, prevention, management and resolution of disputes.

Moreover, our extensive experience in various industries, such as automotive, pharmaceutical, consumer, mining, energy, construction, technology, telecommunications, leisure and hospitality, financial sector and consumer goods, among others, allows us to position ourselves as a viable alternative for our customers, by offering them quality services supported by our many years of experience.





Services

Corporate taxes

The adequate compliance of transfer pricing obligations is relevant in minimizing the risk of a potential audit by the competent authorities. In this regard, it is essential to carry out an adequate analysis of the assets used, functions performed and risks assumed (functional analysis) in inter-company transactions, which will lead us to an appropriate selection and application of the most reliable transfer pricing method (economic analysis) to demonstrate that such transactions comply with the arm's length principle in accordance with the applicable regulations. Considering at all times that these analyses will be the source of information for the fulfillment of other obligations related to the matter.

Our services

Transfer pricing documentation and compliance

- Elaboration and preparation of transfer pricing studies.
- Transfer Pricing Informative Returns: Local File, Master File and Country by Country Reporting. Análisis financieros.
- Financial analysis.
- Informative Tax Return about Inter-company transaction with related parties resident abroad (Appendix 9 DIM).
- Transfer Pricing Annexes for ISSIF and Tax Audit Report.
- Informative Return about Relevant Transactions.





Services

International taxes

Transfer pricing audits have been intensified, this is why we consider a priority to have a robust team of multidisciplinary specialists who accompany our clients in the strategic attention of processes before the tax authorities while liberating their internal resources to attend other responsibilities of their main activities, by taking advantage of our network and experience, as well as, of our multidisciplinary services, reducing risks and penalties. It is important to mention that we do not only focus on reacting to the processes initiated by the authority, we also specialize in implementing preventive mechanisms and best practices.

Our services

Dispute Resolution

- Strategic planning in audit management in transfer pricing and international tax audits disputes.
- Risks assessment.
- Management of Conclusive Agreements Procedures before PRODECON.
- Elaboration of defense files for specific transactions.
- Advance Pricing Agreements for unilateral, bilateral and multilateral (APAs).
- Mutual Agreement Procedure (MAPs).
- Transfer Pricing Expert Opinions for tax controversy and dispute resolution processes.





Services

Audit services

Analyzing the value chain of our clients not only provides innovative ideas that generate efficiencies in the operational structure of companies, but also helps to identify risks and to implement practical solutions that contribute to the development of the business. We are always aligned with the new provisions established by the tax authority and even adhering to the criteria published by the OECD.

Our services

Value Chain Analysis

- Analysis, evaluation and optimization of operational structures.
- Development and implementation of policies for inter-company Transactions.
- Elaboration and analysis of inter-company agreements.
- Risks assessment.
- Identification of intangibles.
- DEMPE analysis.
- Economic substance of existing operations.





Services

Accounting and financial services

We have specialists to evaluate the design of sustainable and specialized solutions related to the establishment of financial transactions in accordance with applicable regulations and focused on increasing the efficiency in resource management and risk reduction.

Our services

Financial Transactions

- Capital structure valuation.
- Interest deduction.
- Financial transactions.
- Centralized Treasury (Cash pool).
- Thin capitalization analysis.





Services

Tax and corporate legal services

Our transfer pricing valuation practice has technical professionals experienced in providing valuation services, who provide the technical support and advice required by our clients in order to help them estimate the value of different tangible and intangible assets, with sustained and internationally recognized methodologies in the valuations field.

Our services

Transfer pricing valuation services

- Stock valuation.
- Tangible / intangible assets valuation





Services

Integral Solutions

Meeting the needs of our clients and contributing to the solution of important problems is our priority, so our network of alliances allows us to expand the scope of our services, even interacting between different specialties, encouraging the development of your business at all times.

Our services

Integral Solutions

- Corporate taxes.
- International taxes.
- Audit services.
- Accounting and financial services.
- Tax and corporate legal services.



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Innovation
Branding
Solution
Marketing
Analysis
Ideas
Success
Management

Technology
Innovation
System