

Transfer Pricing

Are you ready to support your intercompany pricing policy around the world?



Intercompany transactions have never been higher up the agenda of governments, businesses, citizens and other stakeholders, ranging from non-governmental organisations to the media.

In constant motion

Intercompany transactions have been under the scope of Greek tax authorities since 2008, indicating increased scrutiny and a more sophisticated approach when carrying out tax audits. Combined with a relatively small legislative content lifespan (new laws and circulars are set out at least once per year), enterprises must remain ready to implement changes and disclose further their inter-group pricing schemes.

BEPS project is the game changer

On 5 October 2015 MNEs received final recommendations from OECD's Base Erosion & Profit Shifting (BEPS) 15-action project, which introduces changes to the international tax rules and implementation plans. Among others, BEPS focuses on aligning the substance of value creation with profit attribution (actions 8-10) and sets new transparency requirements with Country-by-Country documentation standards (action 13). Effective from 1 January 2016, Transfer Pricing has the most imminent effect of BEPS on taxpayers' returns.

Our Transfer Pricing practice can help you establish a solid international tax position in coherence with the local transfer pricing rules and the OECD guidelines.

Transfer pricing planning and advice

Evaluation of transfer pricing risks based on benchmark search results, economic and industry studies, in order to establish a rational and efficient group pricing policy

Dispute resolution

Lead in challenge resolution litigation and guide negotiations with competent authorities.

Business restructuring and Value Chain Transformation

Assess your value chain management process and find ways to maximise supply chain efficiency, ensuring tax compliance and sustainable operational benefits.

Advance Pricing Agreements

The APA programme is an opportunity for Greek taxpayers to obtain formal agreement on the pricing of intercompany transactions, avoiding lengthy disputes

A unified documentation approach

Gain access to our global centralised documentation and defense processes that take into account the requirements of each jurisdiction

Country-by-Country reporting

Identify tax risks and evaluate the impact of disclosed information, while linking the data to the Master File/Local File analyses



Our team

PwC Greece's Transfer Pricing team consists of 14 experienced experts, economists and lawyers. These tax advisors are ready to manage and address your enterprise needs concerning inter-company transactions.



We provide our services to the largest private and public organisations, including the vast majority of local financial institutions and enterprises engaged in distribution, manufacturing and services providing activities in large-scale business sectors such as construction, energy, nutrition and tobacco, pharmaceuticals and medical, automotive, consumer and professional electronics, retail, information technology and communications



Our local Transfer Pricing team is further supported by a network of over 3,000 professionals specialised in inter-company transactions in more than 80 countries



We have been operating in Greece since 1961 (as Price Waterhouse)



PwC in Greece is the largest professional tax services firm in the country, with over 170 qualified consultants and professionals engaged in providing specialised knowledge in the field of corporate tax and legal

About PwC

At PwC Greece, our purpose is to build trust in society and solve important problems. With offices in 157 countries and more than 208,000 people, we are among the leading professional services networks in the world. We have premises in Athens and Thessaloniki and more than 900 employees. Our people are committed to delivering quality services and to help organisations and individuals create the value they're looking for.



Our clients

During the financial year ended 30 June 2015 PwC firms provided services to:



Fortune Global 500 companies



FT Global 500 companies

Our people



53,049

people joined PwC firms around the world



208,109

This year our global workforce reached a new record level

Tools to help you stay up-to-date

Tax Insights for Transfer Pricing

A free subscription based e-newsletter that gives you instant alerts and analysis of major intercompany transfer pricing issues and related developments from around the world.

Visit www.pwc.com/tpinsights to sign up.

Transfer Pricing Perspectives

These articles cover the issues that are most interesting and important to transfer pricing professionals.

Visit www.pwc.com/transferpricingperspectives

Transfer Pricing to Go

TP to Go is a new mobile application from the PwC global transfer pricing network that brings the best thought leadership from the network directly to your current smart phone. Keep up to date with the latest transfer pricing developments through PwC's TP to Go app. Brought to you by our Global Transfer Pricing Network, TP to Go is available for download on most devices.



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