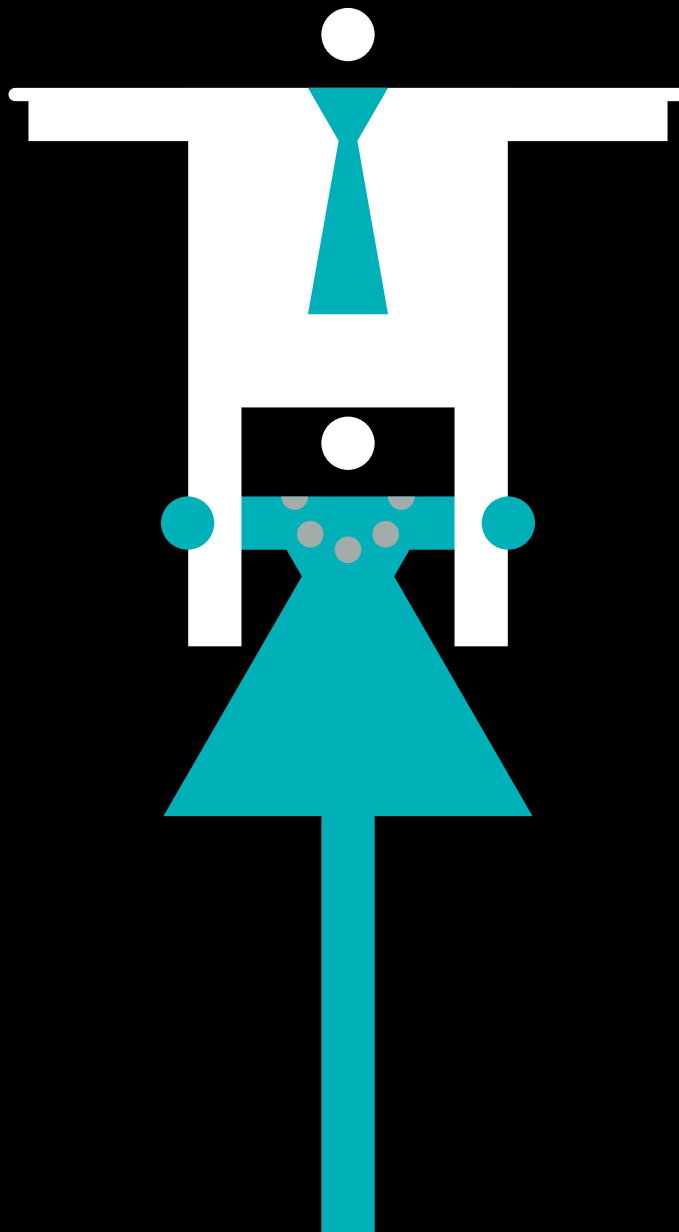


# 2 for the Price of 1

## Penalty Protection and Adjustment Insulation



The Rational Choice



**“The measure of intelligence  
is the ability to change”**

**- Albert Einstein**

# We Look at Things Completely Differently

We believe that the same old way of transfer pricing compliance is not cutting it anymore.

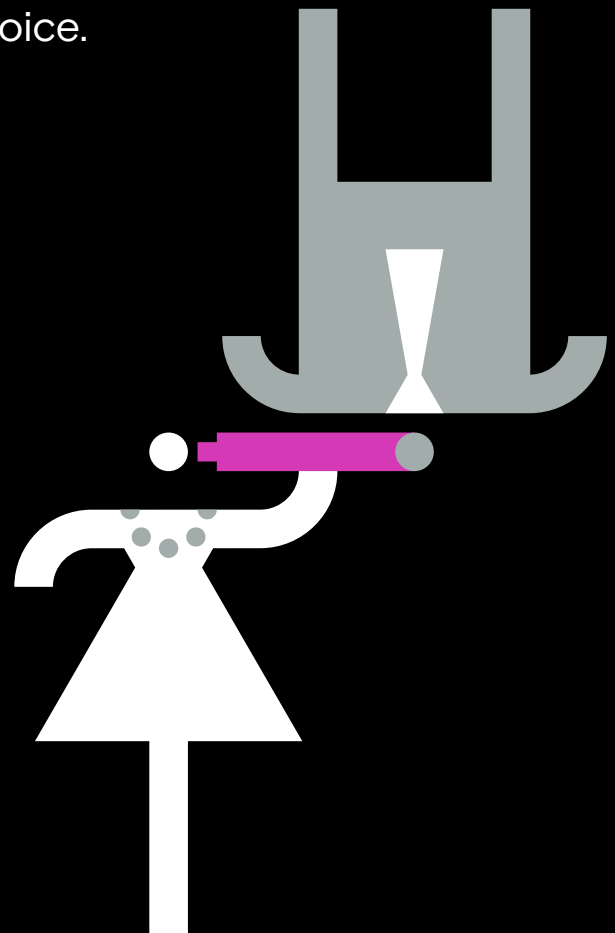
We believe that a new way of transfer pricing compliance needs to be set.  
We are that new standard.

We believe our way is infinitely better. Simply sticking with the “ok way” because that’s how you’ve always done it, just doesn’t make sense.

Companies need to protect themselves from adjustments, not just penalties.

We believe you’ll make the rational choice.

**CrossBorder Solutions -  
It’s the Intelligent Alternative.**

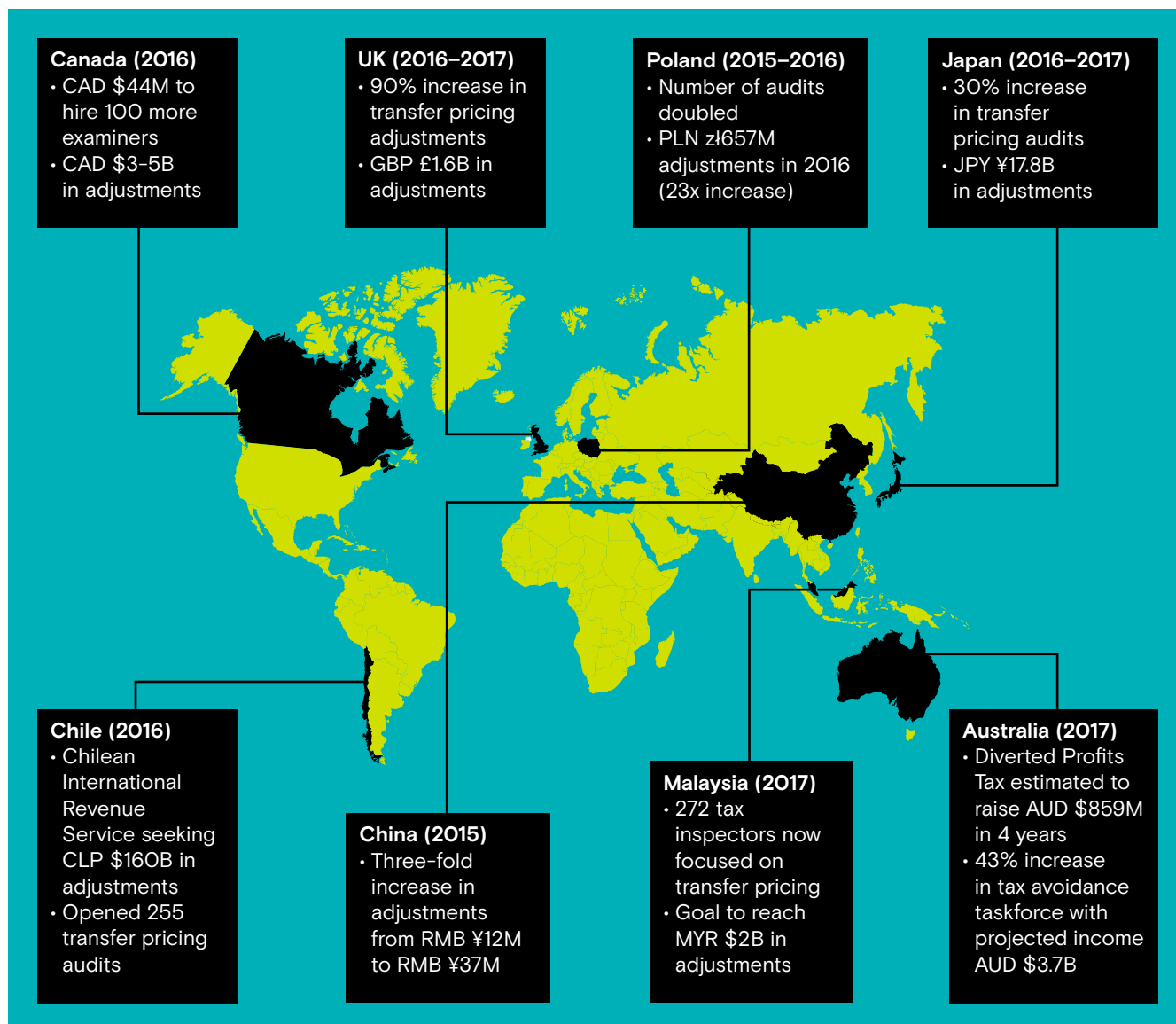


# Transfer Pricing Adjustments

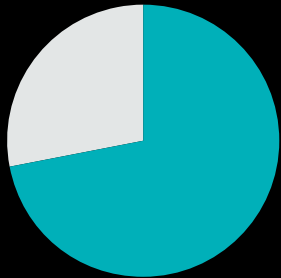
Transfer Pricing Adjustments are the new threat to your bottom line. While there is a natural tendency to focus on transfer pricing penalties, they are rarely imposed. Instead, tax authorities worldwide have been dramatically increasing transfer pricing adjustments to raise revenue.

Often, taxpayers are unprepared to deal with this. They utilize transfer pricing studies that protect against penalties but inadvertently leave them exposed to staggering adjustments in every jurisdiction where they have foreign operations.

Here are some examples.

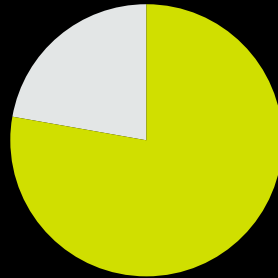


# Key Statistics



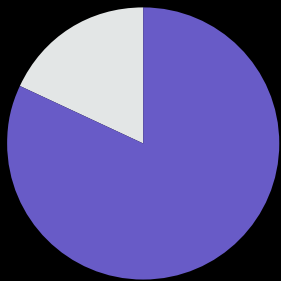
72%

of companies indicated transfer pricing was a core focus of a past audit



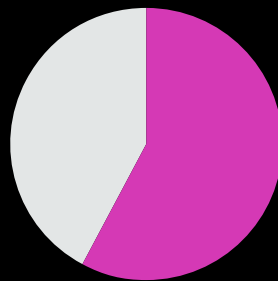
78%

of companies rated transfer pricing adjustments as the number one tax issue facing their multinational corporations



82%

of companies expect an examination by a tax authority into their transfer pricing in the next two years



58%

of respondents experienced an adjustment as a result of an audit into their transfer pricing

# It's a No-Brainer

As revenue authorities substantially increase their audit ability and resources, it is clear that transfer pricing adjustments are becoming the norm, not the exception. If your company has foreign operations, it will likely undergo a transfer pricing audit in the near future and face significant adjustments from multiple jurisdictions.

However, there are concrete steps that companies can take to insulate themselves from local jurisdiction adjustments. While there is no foolproof method, companies can significantly reduce the risk and amount of any resulting adjustments by following our **4 Cs approach**.

Our approach demonstrates to the local examiner that the proper steps were taken to ensure each study was prepared specifically for that local jurisdiction.

Only CrossBorder Solutions UPGRADES existing studies to ensure they meet the documentation requirements of each local jurisdiction, providing companies with both penalty protection and adjustment insulation.



## Customization

- Generic studies are unacceptable
- Studies must meet local requirements, including comparable searches & local language



## Consistent Results

- BEPS information sharing
- Consistency across jurisdictions
- Master File/Local File



## Comprehensive Coverage

- Undocumented transactions lead to largest adjustments
- Analyze all transactions, all countries



## Contemporaneous Reporting

- 3 year update cycle doesn't cut it
- Full updates annually

# Making Transfer Pricing Rational Since Day 1

The original CrossBorder Solutions was founded in 2001 and quickly became the industry leader in transfer pricing compliance. With over 1500 customers, the company radically changed how multinational corporations approached compliance worldwide.

After the company was sold to Thomson Reuters, it continued to innovate and develop cutting edge software that empowered companies to bring their compliance efforts in-house.

Building on this success, the new CrossBorder Solutions continues to revolutionize the transfer pricing landscape.

Spearheaded by the original management team, the company has become the new industry standard in transfer pricing compliance and affordable adjustment protection.

With offices worldwide, and clients from a diverse range of sectors (including technology, software, financial services, automotive, chemicals, pharmaceuticals, consumer goods and retail), the company provides a wide range of transfer pricing services to multinational corporations.

**For more information visit us at [crossbordersolutions.io](http://crossbordersolutions.io)**

## Highlights

**2,000+**

MNC Clients

**670**

Clients from the Fortune 1000

**50,000+**

Transactions Analyzed

**77%**

of clients with \$100M+ sales

**0**

Transfer Pricing Penalties  
in the US or abroad

**47%**

of clients with \$500M+ sales

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