



Center of Excellence

Transfer Pricing Value Proposition



Center of Excellence

Center of excellence acts as an in-house team with a significant technical expertise to provide value and a considerable cost arbitrage.

Co-ordination and Communication

Single global team managing the operational side of transfer pricing needs of a client across all global jurisdictions.

Cost Effectiveness

Centralization of documentation along with access to all expensive transfer pricing benchmarking database(s) from single point can provide cost efficiency and time efficiency.

Data Management

Effective data collection, review and management in achieving all related party transactions for the purpose of substantiation of the transfer pricing policy and compliance requirements.

Consistency and Standardization

Our center of excellence manages client's Transfer Pricing documentation in a consistent and standardized manner providing certainty.

Domain Expertise

Pool of experienced people with technical expertise in transfer pricing ensuring client's global business goals and objectives are met.



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Evolving Transfer Pricing Regulations

Keeping track and having controls in place to correctly analyze and align with changes regard to local transfer pricing laws of HQ, regional HQ and subsidiaries.



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Some Transfer Pricing Project Credentials

Developing transfer pricing documentation for a major wine and spirits manufacturer.

Assisted a multinational group in preparing transfer pricing documentation for 27 companies which are related members of the group in Mexico in supporting their transfer pricing policy operating in the United States, England, Spain and Argentina.

Formulating a global transfer pricing policy for a german based manufacturing company.

Assisted a german based manufacturing company in formulating a global transfer pricing policy at german level by preparing benchmarking planning studies supporting close to 20 subsidiaries operating in North America, Asia Pacific, and European region.

Audit defense for a major distributor of electronic company.

Designed a complex and effective Transfer Pricing defense strategy from an economic standpoint considering an expense intensity ratio adjustment to the gross margin of comparable entities and applying the modified resale price method.

Changing the transfer pricing policy for a global freight forward company.

Assisted one of the largest freight forwarding companies on changing their transfer pricing policy to remunerate its subsidiary from percentage based commission to cost plus, leading to substantial cost savings.

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Our Transfer Pricing Service Offerings

We always provide our clients with the right combination of skills and experience to deliver a quality service that we are proud of.



Transfer Pricing Policy Planning Implementation

- Conduct a diagnostic review of transactions undertaken with related parties.
- Formulate policy for related party transactions (RPTs), and draft report for RPTs undertaken.

1



Transfer Pricing Process Review Advisory

- Reviewing current transfer pricing methodologies consistent with functional economic characterization of transacting party and accordingly, advice transfer pricing strategies in alignment with client's objectives.

2



Benchmarking Analysis

- Benchmarking support by accessing global databases based on region specific requirements.
- Both planning and compliance analysis are undertaken.

3



Transfer Pricing Compliance

- Maintenance of robust documentation as per jurisdiction requirements.
- Assisting in compilation of "Local File, "Master File" and "Country by Country Report"

4



Transfer Pricing Audit Support

- Experienced in protecting client's interests and defending the transfer pricing policy before the advance pricing agreements competent authorities and even on-the-field tax authorities.

5

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Our Core Transfer Pricing Team



Anand Vemuganti

Economist – Transfer Pricing
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Anand has close to 10 years of experience as a global transfer pricing professional and is a qualified TP specialist. He worked for several years as Transfer pricing manager/technology lead for both PWC and Deloitte in the Middle East and has hands on experience on advising clients on projects such as TP policy design, value chain analysis model reviews, APA filings, documentation.



Carolina Herrera

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Carolina has a degree in economics from the Universidad de las Américas Puebla. She has a course on compliance manual and provisions of the Mexican Law to Regulate the Activities of Savings and Loan In Cooperative Societies (LRASCAP) and also participated in research on economic and social approach at the international level. Currently, she is a consultant in the transfer pricing area of PKF Mexico, with a course on transfer pricing from Universidad de Concepción (Chile). She has experience in preparing transfer pricing documentation for national and multinational companies.

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Our Transfer Pricing Leader



Jimmy Cruz

Center of Excellence Transfer Pricing Leader

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Jimmy Cruz holds a degree in Economics from the Universidad Autonoma Metropolitana. He has studies in Business Analysis and Valuation from the London School of Economics and Political Science in London and completed a master's degree in Philosophy and Social Sciences from ITESO (Jesuit University of Guadalajara).

Jimmy Cruz has served for more than 25 years as a consultant economist for national and multinational groups and also for Governments. Currently and since 2011 he is a partner of PKF Mexico and a leader in consulting and financial services such as debt structuring and valuation of projects, valuation of business and intangibles. He has a strong specialization in transfer pricing in regional and global documentation projects, dispute resolution, advance pricing agreements (APA), competent authority procedures and defense of audits.

Jimmy Cruz co-founded the Transfer Pricing group of Baker & McKenzie in 2000 and collaborated with the Mexico City, Juarez, Chicago, New York, Palo Alto, Bogotá and Caracas offices carrying out projects for leading companies in the region. He started his professional career at KPMG in 1997 and during 1998 he was transferred to the Miami office of that Firm where he worked on projects for large companies with operations in Latin America.

He has been a speaker and lecturer at multiple forums in Mexico, Latin America, Europe, Asia, Canada and the United States. He is a frequent columnist and commentator in print and electronic media. In 2009 he was appointed as the first Coordinator of the Transfer Pricing Commission of the National College of Economists.

