TRANSFER PRICING AND CONTROLLING



OUR TEAM AND SERVICES OFFERING



Founder and managing director oliver.treidler@tp-and-c.de +49 173 6440772 More than 15 years of



Consultant tom.kunz@tp-and-c.de

experience in this field!

Working student n.kukharenka@tp-and-c.de

We offer advice on all transfer pricing issues. The focus of our work is a pragmatic application of the arm's length principle.

Our services:

Working student

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- Conception and optimisation of transfer pricing systems
- Preparation and quality assurance of transfer pricing documentation
- Advice on special circumstances and exceptional business transactions
- Economic analyses
- Consulting for consultants
- Excel applications (TP Tools) and workshops

We love transfer pricing!

We are number one in this business and we was chosen by a lot of companies needing our help. Give us a chance to help you to!

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What do we love about TP

- What we do not like too much?
- What we do when we do not do TP?

OLIVER

- What do you love most about Transfer Pricing?
 - ➤ Learning about so many different business models as well as the respective discussions with clients about core value drivers. It just never gets boring.
 - ➤ The fact that I have found a niche in which I feel at home as an economist who is not good in math and never understood why some people are so keen on keeping macro- and microeconomics separate from each other.
- What aspect of transfer pricing could you do without?
 - In 2021 I would likely sometimes have said "tax auditors", but I guess we can' really do without them...
 - ➤ While I absolutely love transfer pricing at the crossing of tax and economics/business, I am somewhat spooked by cases in which issues regarding VAT or customs play a major role (luckily, I know good people to refer these cases to...)
- Favorite (non-TP) book(s) and author(s)?
 - Tai-Pan and Nobel House by James Clavell.
 - > Everything from John Grisham (yes, even economists can like Grisham).
- Current and previous show binge-watched on Netflix?
 - **▶** 10/22/63.
 - Cobra Kai (all seasons).





NASTJA

- What do you love about Transfer Pricing?
 - ➤ Working with companies from different sectors and with different business models, and also benchmarking. Every time you learn something new and the tasks are never the same.
- What aspect of transfer pricing could you do without?
 - > Trying to understand what is meant by one or another paragraph of OECD GL.
- Favourite non-TP book and author?
 - "The Master and Margarita" by Mikhail Bulgakov.
 - Everything by Jane Austen.
- Current and previous show binge-watched on Netflix?
 - > The Witcher.
 - Breaking Bad.





LISA

- What do you love about Transfer Pricing?
 - ➤ Its project-based nature, and the fact that our clients needs and the related tasks vary enough for it to never get boring. I'm very happy to have found an area that combines this with my interest in taxes.
- What aspect of transfer pricing could you do without?
 - Working through the homepages of 50 different eastern european crane rentals during a manual benchmark certainly trains your skills in using google translate, but also makes you appreciate the 99% of TP tasks that are (more) fun.
- Favourite non-TP book and author?
 - Favorite books would be Zero and/or Black Out by Marc Elsberg.
 - Anything written by Ferdinand von Schirach.
- Current and previous show binge-watched on Netflix?
 - > Bridgerton.
 - Chernobyl (Amazon Prime but very worth a mention).





TOM

- What do you love about Transfer Pricing?
 - > Understanding the value-chain and unique selling proposition of different business models and listen to entrepreneurs speaking about it.
 - Learning about the individual specific economic circumstances each firm faces and build arguments around it to defend applied transfer prices.
- What aspect of transfer pricing could you do without?
 - ➤ Intercompany Agreements essential but I prefer the focus on the economic part and not the "legal" language and provisions.
- Favourite non-TP book and author?
 - Getting to yes negotiating an agreement without giving in by Roger Fisher, William Ury, and Bruce Patton.
 - Die Kunst guten Führens Macht in Wirtschaft und Politik by Karl-Ludwig Kley and Thomas De Maiziere.
- <u>Current and previous show binge-watched on Netflix?</u>
 - Currently, I rarely watched Netflix but the last series I really enjoyed were "La Casa de Papel" and "White Collar" (although on Amazon prime). Both series treat about a genius protagonist playing an emotional cat-and-mouse game with their antagonist.



