

B1 TRANSFER PRICING SOLUTIONS

Tax authorities worldwide are intensifying transfer pricing scrutiny by introducing new reporting requirements, enhancing audit mechanisms, expanding the scope and number of audit activities, and imposing increasingly stringent penalties.

Transfer pricing remains one of the most complex and widely discussed areas of tax regulation in Belarus.

As a result, businesses face a dual challenge:

- ▶ On the one hand, they need to adapt their business models quickly and flexibly to the growing complexity of global supply chains.
- ▶ On the other hand, they must comply with transfer pricing regulations.

To address both operational challenges and regulatory requirements, businesses need integrated solutions that transform transfer pricing from a risk area into a manageable business process.

TP SOLUTIONS is a suite of products covering all aspects of transfer pricing management – from preparing transfer pricing reports to supporting and protecting your company during audits. Each product is designed as a modular solution, allowing you to select the level of involvement that best meets your needs.



Depending on the structure of a group and the nature of transactions carried out by its entities, different types of transfer pricing documentation may be required in Belarus and other jurisdictions.

TP.CORE

A basic compliance package designed to prepare transfer pricing documentation, provide an economic justification for applied prices, and conduct benchmarking studies to confirm the arm's length nature of pricing

RESULT

Accurate and timely transfer pricing reporting and mitigation of transfer pricing risks

TP.TRACK

Ongoing monitoring of profitability and pricing throughout the year, with a final analysis performed prior to year-end reporting

RESULT

Confidence in compliance with the arm's length principle and the ability to make timely pricing adjustments

TP.BUSINESS

TP.CORE (end-to-end compliance package), combined with the development or update of pricing methodologies for specific transactions or the entire value chain within a company or group

RESULT

A structured pricing framework with periodic monitoring and validation

TP.360

An annual subscription for ongoing transfer pricing support, combining regular advisory assistance with ad hoc consultations

RESULT

Prompt resolution of transfer pricing issues throughout the year, seamlessly integrated with other TP services (such as TP.CORE or TP.BUSINESS)

TP.DEFEND

Support during pre-audit reviews and transfer pricing audits, including preparation of the company's position and calculations, as well as interaction with tax authorities

RESULT

Protection of the company's interests and assistance in mitigating the risk of additional tax assessments

TP.RESHAPE

Advisory support on transfer pricing matters in the context of business restructuring, including changes to value chains and the reallocation of functions, risks, and assets

RESULT

An optimized structure and a robust operating model aligned with the arm's length principle and tax considerations

TP.VIP

Full outsourcing of the transfer pricing function – from methodology and calculations to reporting and interaction with tax authorities

RESULT

End-to-end management of the transfer pricing function, with additional services available upon request

TP.LEARN

Delivery of corporate transfer pricing seminars and training sessions tailored to the company's business specifics

RESULT

Established in-house transfer pricing capabilities sufficient for the independent analysis and management of key TP matters

The products can be easily combined and scaled to address specific needs – from a one-off project to comprehensive support and end-to-end outsourcing of the transfer pricing function.

CONTACT DETAILS



**RUSLAN
RADZHABOV**
Partner
ruslan.radzhabov@b1.ru



**VASILII
ANISHCHENKO**
Partner
vasilii.anishchenko@b1.ru



**EKATERINA
SYRNIKOVA**
Senior Manager
ekaterina.syrnikova@b1.by



**NIKITA
CHURNOSOV**
Senior Manager
nikita.churnosov@b1.by



**NATALIA
KONOPLITSKAYA**
Manager
natalia.konoplitskaya@b1.by



**ANNA
ALEKSEEVA**
Manager
anna.s.alekseeva@b1.by