

# ■ ABOUT TRANSFER PRICING SOLUTIONS

Transfer Pricing Solutions (or TPS) is a boutique firm that specialises in providing Practical, Proactive and Cost Effective transfer pricing advice from our experienced team to a global list of clients.





# PRACTICAL PROACTIVE COST EFFECTIVE

We are a team of professionals that deliver a quality service with fast turnaround.



TPS was established in 2010 in Australia which still serves as the Group's headquarters. Since establishment, the Group has expanded its physical presence beyond Australia and now includes a regional Asian office in Singapore as well as a Malaysian presence.



The firm has established a successful track record across industries delivering:

- √ 200 transfer pricing documentation reports worldwide
- ✓ More than 300 benchmarking studies for MNEs across
  different industries around the world; and
- $\checkmark$  More than 60 transfer pricing workshops and seminars in the region.

# **FLEXIBLE TEAM**



The diverse team are spread between our three offices and are all ex-Big 4 specialists who have practiced in various regions including Europe, the Americas and the Asia Pacific.

Languages spoken by the team include Spanish, Mandarin, Hindi, Tamil, Malay and English.

## TRANSFER PRICING SOLUTIONS

# **GROUP STRUCTURE**



TRANSFER PRICING SOLUTIONS **AUSTRALIA** 



TRANSFER PRICING SOLUTIONS **ASIA PTE LTD (Singapore)** 



TRANSFER PRICING SOLUTIONS **MALAYSIA SDN BHD** 





#### WHY TRANSFER PRICING SOLUTIONS

# **'SHIELD'**6-POINT GUARANTEE

- SECURITY
  Security of your commercial information
- HIGH QUALITY
   Team with 5 years or more of TP advisory experience
- INTEGRITY
  Every quote we provide is final, fixed and all-inclusive
- EXECUTION
  Seamless execution
- LEADERS
  Thought leaders
- DIRECTORS
   Director involvement in projects and available.
- in @company/transfer-pricing-solutions-australia





#### **DIRECTOR / TECHNICAL LEAD, SINGAPORE**

# **ADRIANA CALDERON**

Adriana is the co-founder of Transfer Pricing Solutions Asia and Malaysia. Adriana has extensive international experience with Big Four and mid-tier firms advising multinational companies in the areas of corporate and international taxation across South America, the US, Australia and the Asia Pacific Region.

As a TP practitioner, Adriana has advised companies in the Asia Pacific Region across various industries and in a wide range of projects associated with planning, compliance and dispute resolutions with tax authorities. She has also participated in specialised projects involving pricing of financial transactions, business restructures and negotiation of APAs. Most recently, she has participated in TP planning projects to implement BEPS's Action Plan and country-by-country reporting.

Adriana also enjoys teaching and is a regular speaker and facilitator of Transfer Pricing seminars and workshops. She is a transfer pricing trainer for the Institute of Singapore Chartered Accountants and Singapore Institute of Accredited Tax Professionals. Adriana has also facilitated training sessions for CFOs, tax teams of large companies and consultancies, and tax executives at the Australian Taxation Office.

Adriana is an associated lecturer at Singapore Institute of Technology.

# **DIRECTOR / TECHNICAL LEAD, MALAYSIA**

# HONG CHUAN TAN

Hong Chuan Tan has five years of experience in transfer pricing and GST. He played a key role in pioneering and developing the transfer pricing practice in Transfer Pricing Solutions Malaysia Sdn Bhd.

He specializes in the area of transfer pricing where he manages a portfolio of clients comprising companies from a broad range of industries such as mining; electrical and electronics; plastic products; construction and property development; hotels; real estate; oil and gas amongst others.

He has prepared transfer pricing documentation (Master File and Local File) for the Asia Pacific region, Australia, Malaysia, Singapore and the Philippines. He possesses experience in working with leading brands with the primary focus to exceed the expectations on clients' service delivery while ensuring optimum brand impact. He provides effective and resourceful information on the transfer pricing related problems, provide recommendations for the client's business and process improvements.

## DIRECTOR / TECHNICAL LEAD, AUSTRALIA

# **SHANNON SMIT**

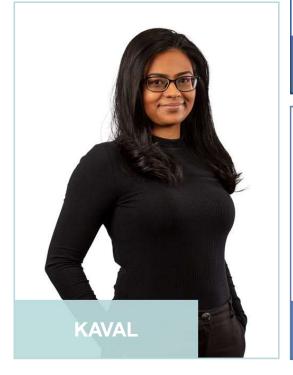
Shannon Smit is the founding director of Transfer Pricing Solutions and has consulted multi-national companies on transfer pricing, taxation and accounting for over 25 years. Transfer Pricing Solutions has been recognized for their expertise, and in 2017 Shannon was thrilled to be awarded Asia Pacific Transfer Pricing Leader of the Year.

Shannon's career has provided her with a wide range of experience including global project management, transfer pricing and operational implementation for large-scale business transformation projects. She also has hands-on implementation experience with supply chain issues and managing interrelationships between international tax, accounting, IT systems and training of operations personnel. With eight years spent working in the USA and Europe, she has extensive experience in advising both Australian and foreign multi-national companies. Their clients include large ASX listed companies, private Australian companies, SME clients, foreign subsidiaries based in Australia, accounting and law firms.

Shannon was appointed to the Australian Governments Board of Taxation's Working Group as an Expert Panel Member for the Review of Tax Impediments Facing Small Business and Shannon also lectures in Transfer Pricing as a part of the Melbourne University's Law School International Tax Program.



# MEET THE TEAM





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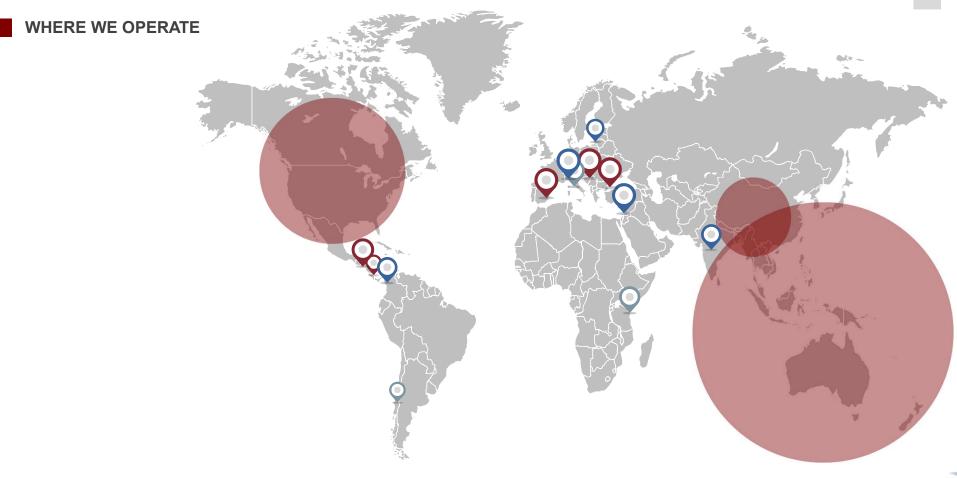












INDUSTRY LEADERSHIP

# CONTRIBUTION & RECOGNITION

TPS has contributed to various editions of key industry magazines including the Institute of Singapore Chartered Accountants Journal that is distributed to the accounting profession in Singapore. The articles can also be accessed through the links below:

**Busting Services Transactions Myths** 

SIATP Drums To The Beat Of Transfer Pricing

**Classic TP Hits and Contemporaries** 

Don't Trip Over Transfer Pricing Risks

Rising High Above TP Risks

Sense & Sensibility of TP Methods



INTERNATIONAL TAX REVIEW

Asia Tax
Awards 2019

WINNING FIRM

#### INTERNATIONAL TAX REVIEW

Asia Tax Awards 2017

Best Newcomer of the Year

#### INTERNATIONAL TAX REVIEW

Asia Tax Awards 2017

Asia Transfer Pricing Leader of the Year









WINNER

Transfer Pricing Team of the Year

Client by Industry	Countries			
	Involved	Project Type	Geographical Scope	Transaction Type
Manufacturer of Pharmaceutical Products	Singapore, India, France	Transfer Pricing Documentation for contract R&D	Local Singapore	Contract R&D
Large distributor of electronic products	Australia	Transfer Pricing Documentation intercompany loan and ATO review	Local Australia	High value intercompany loan involving high interest deduction
Global provider of supply chain solutions	Singapore and additional 10 Companies	Review of transfer pricing service policy including implementation in ERP system	Local Singapore	Review of cost allocation of services for a global shared center of large MNE. Our work also involved review of implementation of the service charge.
Global provider of supply chain solutions	Singapore, Malaysia	Transfer Pricing Documentation for Share Service Centre	Singapore and Malaysia	Shared Service Centre
Largest manufacturer and distributor of chicken products in Indonesia	Indonesia, Taiwan, Singapore	Transfer Pricing Documentation Royalty License and contract R&D	Singapore	Royalty License and contract R&D
Distributor of petrochemicals	Singapore, Vietnam, Malaysia	Global Transfer Pricing Documentation including Master File and Local File for all countries	Global including Master and Local for all countries	Sales and Purchase of Products Services

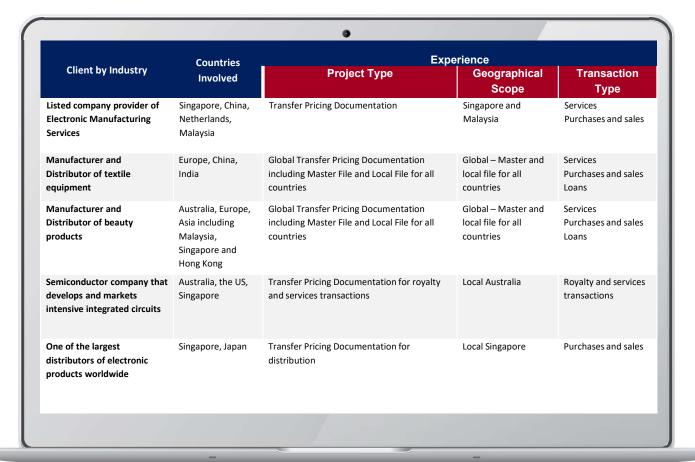


Client by Industry	Countries	Experience		
	Involved	Project Type	Geographical Scope	Transaction Type
Large mining company listed in Thailand	Singapore, Thailand	Transfer Pricing Documentation marketing hub	Local Singapore	Services including costs allocation
Distributor of fertilisers	Singapore, Australia and South East Asia	Transfer Pricing Documentation for sales and purchases	Singapore and Australia	Sales and purchases
Provider of infrastructure services	Australia, Singapore, Malaysia, Indonesia	Global Transfer Pricing Documentation including Master File and Local File for all countries TP Review by Tax Authority in Indonesia	Global including Master and Local for all countries; TP review by Indonesian tax authorities	Services Loans Purchases and sales of products
Company in the business of water management, recycling and waste recovery	Australia, France	Transfer Pricing Documentation for pricing perpetual notes.	Local Australia	Pricing of perpetual notes
Large Indonesia listed manufacturer of wood	Singapore , Indonesia	Transfer Pricing Planning Documentation distribution	Local Singapore	Purchases and sales
Family Office	Singapore, UK	Transfer Pricing Documentation Investment Management and Advisory	Local Singapore	Investment Management and Advisory



	Countries	Experience			
Client by Industry	Countries Involved	Project Type	Geographical Scope	Transaction Type	
Provider of infrastructure services	Australia, Singapore, Malaysia, Indonesia	Global Transfer Pricing Documentation including Master File and Local File for all countries TP Review by Tax Authority in Indonesia	Global including Master and Local for all countries; TP review by Indonesian tax authorities	Services Loans Purchases and sales of products	
Manufacturer and distributor of toys	Australia, China, Hong Kong, the US	Global Transfer Pricing Planning and Documentation for business expansion	Global	Services Purchases and sales of products Royalty license	
One of the largest traders of textiles	Australia, Singapore, India	Global Transfer Pricing Planning and Documentation for business expansion	Global	Services Loans	
Manufacturer of metal stamp products	Singapore, China, Malaysia	Global Transfer Pricing Planning and Documentation for business expansion	Global	Sales and Purchases Services	
Software Developer Marine Industry	Singapore , Norway	Transfer Pricing Planning Documentation to set up a service entity	Local Singapore	Management and technical services including cost allocation	
Asset Management Company	Australia, Singapore, Germany	Transfer Pricing Documentation	Local Singapore	Asset management services	







#### **CLIENT TESTIMONIAL**

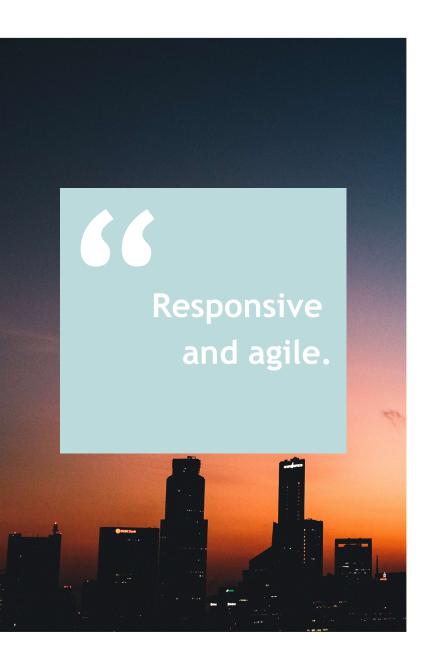
Transfer Pricing Solutions Asia has been engaged by Group and its subsidiaries as their transfer pricing consultant since approximately 5 years ago.

During the engagement. the consultants especially Adriana Calderon, had demonstrated excellent knowledge at all times to perform their work conscientiously and expeditiously. They are a group of excellent consultants who listed and communicate to client at all times. We are extremely pleased with her professional services and her delicate time towards this engagement.

In view of the dedication and ability, we are confident that Transfer Pricing Solutions Asia will prove to be a valuable asset to our organisation and we look forward to continue working hand in hand with it.

Finance Manager - Operations MNEs infrastructure industry



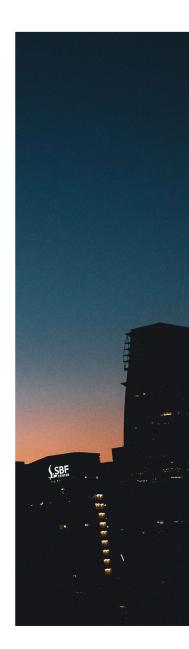


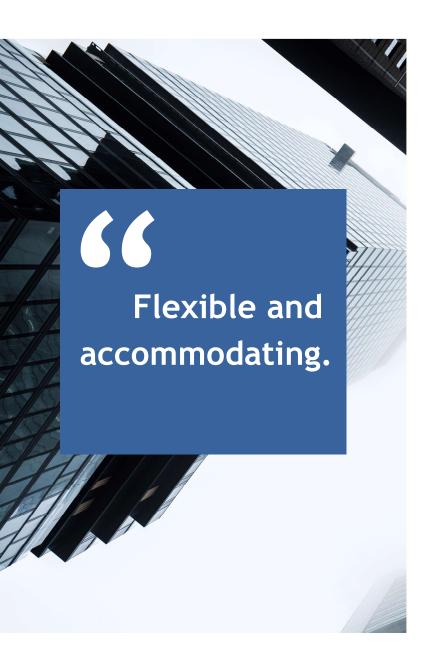
## **CLIENT TESTIMONIAL**

Transfer Pricing Solutions Asia has been engaged by our company as our transfer pricing consultant and assisted us with the preparation of transfer pricing documentation for the group.

TPS Asia is very knowledgeable in the area of transfer pricing offering a practical approach and support. During the project, they were responsive and agile. They always listed and communicate to the client at all times. We are very pleased with their professional services and dedicated time during the project.

CFO, Singapore MNEs





#### **CLIENT TESTIMONIAL**

Transfer Pricing Solutions Asia has assisted us with a transfer pricing project involving the review of services charges from our Global Share Service Centre to our subsidiaries worldwide.

TPS Asia is very knowledgeable in the area of transfer pricing offering a practical approach that suits our needs and budget; they are flexible, accommodating and nice to work with. During the project, they were very responsive and proactive; they did their best to understand our needs and to provide solutions to our challenges with the transaction they reviewed.

Global Head of Tax, Singapore MNEs



## CONTACT AND FOLLOW

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