

Transfer Pricing Documentation Analysis

Date: [Insert Date]

[Your Name]

[Your Position]

[Your Company]

[Your Address]

[City, State, Zip Code]

[Email Address]

[Phone Number]

[Recipient Name]

[Recipient Position]

[Recipient Company]

[Recipient Address]

[City, State, Zip Code]

Dear [Recipient Name],

Subject: Transfer Pricing Documentation Analysis for Profit Allocation

We conducted an analysis regarding the transfer pricing documentation related to the profit allocation for [Company Name/ Business Unit]. The primary objective of this analysis is to ensure compliance with tax regulations and to support the arm's length principle as mandated by the OECD guidelines.

Our review encompassed the following key areas:

- Evaluation of intercompany transactions
- Comparison of pricing methods applied
- Assessment of economic and market conditions
- Review of functional and risk profiles of the entities involved

Based on the findings, we recommend the following actions to enhance the accuracy and compliance of the profit allocation:

1. Adjustments to the pricing models used
2. Further documentation for supporting analyses
3. Regular updates in line with market changes

We appreciate your cooperation during this process. Should you have any questions or require further clarifications, please do not hesitate to reach out.

Thank you for your attention to this matter.

Sincerely,

[Your Name]

[Your Position]