

Transfer Pricing Documentation

Date: [Insert Date]

To:

[Recipient Name]

[Recipient Position]

[Company Name]

[Company Address]

Subject: Intercompany Agreement Transfer Pricing Documentation

Dear [Recipient Name],

This letter serves as documentation of the intercompany agreements between [Company A] and [Company B] concerning the transfer pricing methodology applied for the fiscal year [Insert Year].

Overview of the Intercompany Agreement

1. Parties Involved:

- [Company A]: Description of services and role
- [Company B]: Description of services and role

2. Purpose of the Agreement:

[Briefly describe the purpose of the agreement and the nature of the transactions]

Transfer Pricing Methodology

The following transfer pricing method has been applied:

- [Describe the method used, e.g., Comparable Uncontrolled Price (CUP), Cost Plus, etc.]
- [Explanation of the rationale behind the chosen method]

Financial Considerations

The pricing and remuneration agreed upon have been determined based on the arm's length principle and are reflected in the following manner:

- [List of key financial terms, pricing details, fees, etc.]

Compliance and Documentation Retention

Both parties agree to maintain adequate documentation to support the transfer pricing practices and ensure compliance with applicable regulations.

Please feel free to reach out if you have any questions or require further information regarding this matter.

Best regards,

[Your Name]

[Your Position]

[Company Name]

[Contact Information]