



• **120+**  
Countries Covered



# • Transfer Pricing Analyzer

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## Maximize Value and Productivity

- TPA gives you clarity and control over global transfer pricing—simplifying compliance, managing risk, and saving time.

## Clarity and Control in 120+ Jurisdictions

RegAnalytics' Transfer Pricing Analyzer (TPA) helps multinational enterprises stay ahead of the curve in an everchanging regulatory world. Covering 120+ jurisdictions and OECD/BEPS standards, it centralises regulations, treaties, and expert commentary with tools for FAR/BEPS analysis, project tracking, and regulatory updates—boosting productivity, reducing risk, and cutting costs.



# 120+ Countries. **One** Platform.

Transfer Pricing Analyzer | 02

Albania  
Algeria  
Angola  
Argentina  
Armenia  
Australia  
Austria  
Azerbaijan  
Bahrain  
Bangladesh  
Belarus  
Belgium  
Bolivia  
Bosnia and Herzegovina  
Botswana  
Brazil  
Bulgaria  
Cambodia  
Cameroon  
Canada  
Chile  
China  
Colombia

India  
Indonesia  
Ireland  
Israel  
Italy  
Jamaica  
Japan  
Jordan  
Kazakhstan  
Kenya  
Korea (Republic of)  
Kuwait  
Kyrgyzstan  
Latvia  
Lebanon  
Liberia  
Lithuania  
Luxembourg  
Malawi  
Malaysia  
Malta  
Mexico  
Mongolia

Costa Rica  
Croatia  
Cyprus  
Czech Republic  
Democratic Republic  
of Congo  
Denmark  
Dominican Republic  
Ecuador  
Egypt  
El Salvador  
Estonia  
Ethiopia  
Finland  
France  
Georgia  
Germany  
Ghana  
Greece  
Guatemala  
Honduras  
Hong Kong  
Hungary  
Iceland

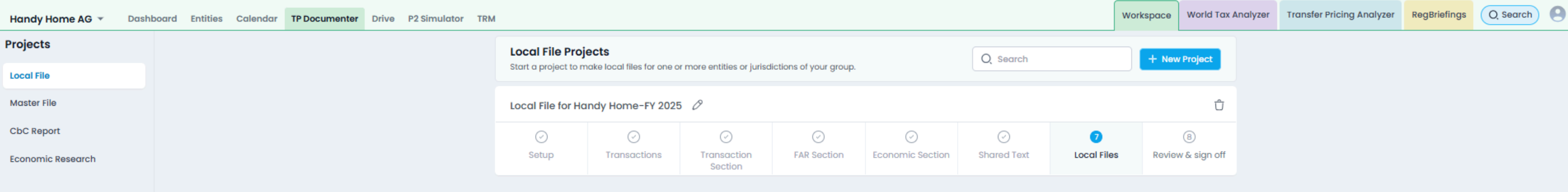
Montenegro  
Morocco  
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New Zealand  
Nicaragua  
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Panama  
Papua New Guinea  
Paraguay  
Peru  
Philippines  
Poland  
Portugal  
Puerto Rico  
Qatar  
Romania  
Russia  
Rwanda  
Saudi Arabia

Senegal  
Serbia  
Singapore  
Slovak Republic  
Slovenia  
South Africa  
Spain  
Sri Lanka  
Sweden  
Switzerland  
Taiwan  
Tanzania  
Thailand  
Tunisia  
Turkey  
Uganda  
Ukraine  
United Arab Emirates  
United Kingdom  
United States  
Uruguay  
Uzbekistan  
Venezuela  
Vietnam  
Zambia  
Zimbabwe

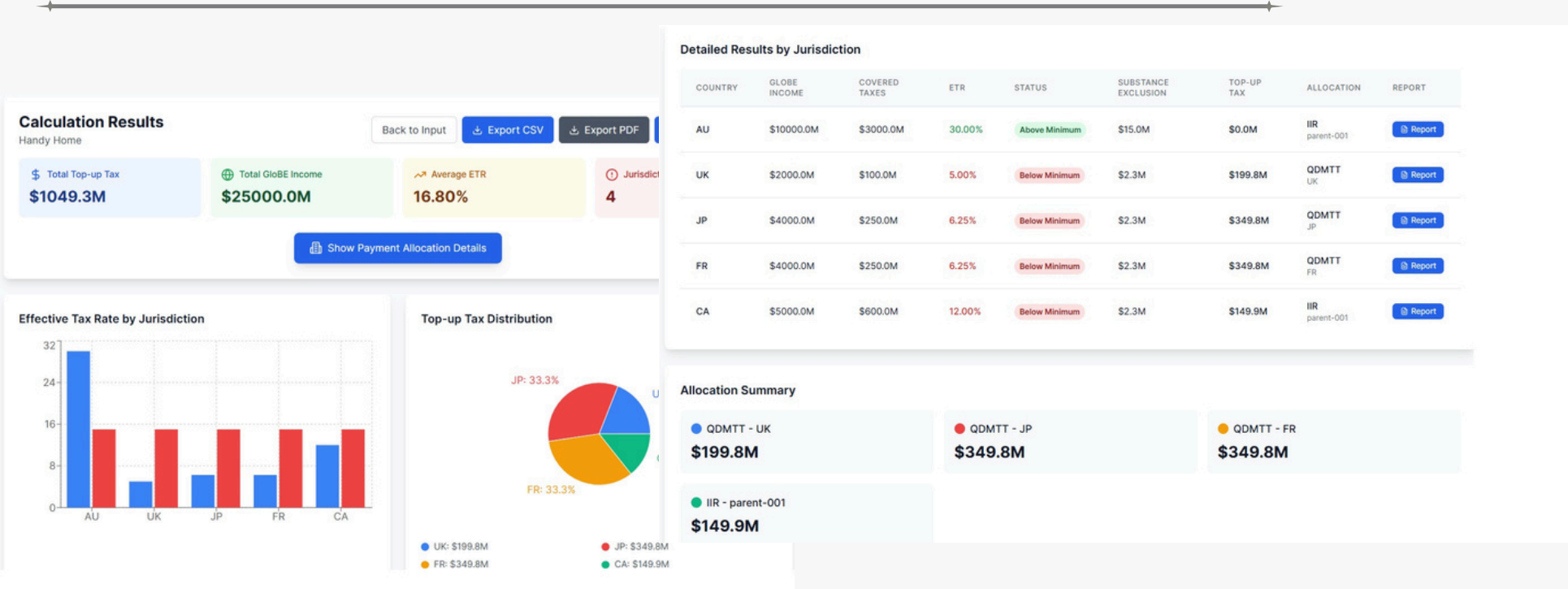
Trusted  
coverage  
across  
120 jurisdictions  
worldwide—  
bringing  
global  
compliance  
into one  
view.



# Powerful Tools for Smarter Compliance



**TP Documenter**  
Create Local Files, Master Files, and CbC reports with guided workflows. TPA ensures consistency, saves time, and delivers documentation ready for submission.



**TRM (Tax Risk Manager)**  
Identify and monitor exposures, track compliance gaps, and gain insights to strengthen tax governance and decision-making.

**P2 Simulator**  
Run scenarios and calculate effective tax rates across jurisdictions. TPA supports GloBE compliance and helps plan strategically under global minimum tax rules.



## Why Companies **Trust** TPA.

*60% of global enterprises admit their transfer pricing strategy needs improvement. TPA goes beyond static research — with Analyzer and Projects features, it actively guides compliance and preserves documentation, making transfer pricing truly manageable.*

### **Forms & Templates**

Compliance forms, APA requests, documentation models.

### **Timely News Updates**

Aggregated global TP developments from trusted sources.

### **Expert Commentary**

Case laws, interpretations, and insights from TP specialists.

### **FAR & BEPS Tools**

Collect data, assess risks, run compliance analysis.

### **Project Tracking & Audit Trail**

Save research, maintain document history, ensure transparency.





# TP Documenter and related TP services.

TP Documenter is an add on module for TPA that combines the rules information in the former with the company data to produce the full range of reports needed for transfer pricing compliance. The module supplements the regulatory and compliance analysis functions with additional FAR analysis and appropriate method selection analysis, and helps produce the Local File needed by most jurisdictions. It also provides an Economic analysis function that can help do benchmarking using a TNMM approach using publicly available data.

Economic Analysis Research

Number of employees

1500

Country

United States

Industry

SIC (Standard Industrial Classification)

6029

Find Comparable Companies

Profitability Analysis

Company Name	Country	Profit Margin 2021 (%)	Profit Margin 2022 (%)	Profit Margin 2023 (%)	Average Profit Margin (%)
HSBC Canada	Canada	27.4	29.2	22.8	26.5
Royal Bank of Canada (RBC)	Canada	28.0	29.0	26.7	27.9
Barclays	United Kingdom	21.3	22.6	19.1	21.0
Lloyds Banking Group	United Kingdom	24.5	25.0	21.6	23.7
HSBC UK	United Kingdom	24.8	23.7	20.5	23.0
First Republic Bank	United States	27.9	23.7	17.6	23.1
M&T Bank	United States	35.2	27.1	30.2	30.8
BMO Harris Bank	United States	26.1	27.4	22.5	25.3
30th percentile					23.0
Median					25.3
70th percentile					27.9

To help users complete their full transfer pricing compliance needs, Reganalytics also provides packaged service offerings at a fixed price. These can include:

- TP economic analysis validation where the user has done their own analysis using public data or through another licensed data set
- Outsourced benchmarking and report completion services

FAR Analysis Research

Industry

e.g., Software, Automotive

SIC (Standard Industrial Classification)

6029

Controlled transactions

Interest income, Management fees, Forex commission

Next

FAR Analysis Research

1. What is the company's overall revenue structure, and how do interest income, management fees, and forex commissions contribute to it?

2. How does the company determine the pricing for interest income in controlled transactions?

3. What methodologies does the company use to allocate management fees among its subsidiaries or related entities?

4. How are forex commissions calculated, and what factors influence their pricing in controlled transactions?

5. What are the terms and conditions associated with the interest income agreements?

6. How does the company ensure compliance with transfer pricing regulations for management fees?

7. What documentation does the company maintain to support the pricing of these transactions?

Type your answers beneath each question in the blank lines.

Back

Ask someone to fill

Next

Interest Income

Functions

Loan Origination

The function of loan origination involves assessing creditworthiness and structuring loan agreements for clients. This is crucial for generating interest income, as it directly impacts the volume and quality of loans issued. The company must ensure that its pricing for interest income is competitive yet compliant with transfer pricing regulations, as indicated in Q2 and Q12.

Risk Assessment

Risk assessment is essential in determining the likelihood of default on loans, which influences the pricing of interest income. By evaluating the credit risk associated with borrowers, the company can adjust interest rates accordingly to mitigate potential losses. This function is vital for maintaining profitability and is highlighted in Q14, where intercompany financing arrangements must be managed effectively to minimize risk exposure.

Regulatory Compliance

Ensuring compliance with financial regulations is a critical function for the company, particularly concerning interest income. This includes adhering to transfer pricing rules and documenting agreements to support pricing strategies, as discussed in Q5 and Q16. Non-compliance can lead to significant penalties and reputational damage, making this function paramount for sustainable operations.

Portfolio Management

Portfolio management involves overseeing the company's loan portfolio to optimize returns from interest income. This includes monitoring performance metrics and adjusting strategies based on market conditions, as indicated in Q8. Effective portfolio management is crucial for maximizing revenue and minimizing risk, directly impacting the company's financial health.

Assets

Loan Portfolio

The loan portfolio represents the collection of loans issued to clients, which is a significant asset for generating interest income. The





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