



• **120+**
Countries Covered



• **Transfer Pricing Analyzer**



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.**

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
Mozambique
Namibia
Netherlands
New Zealand
Nicaragua
Nigeria
Norway
Oman
Pakistan
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

The screenshot shows the 'TP Documenter' interface for 'Handy Home AG'. The main navigation bar includes 'Dashboard', 'Entities', 'Calendar', 'TP Documenter', 'Drive', 'P2 Simulator', and 'TRM'. The 'TP Documenter' section is active, showing a 'Local File Projects' overview with a search bar and a '+ New Project' button. Below this, a specific project 'Local File for Handy Home-FY 2025' is shown with a progress bar containing steps: Setup, Transactions, Transaction Section, FAR Section, Economic Section, Shared Text, Local Files (7), and Review & sign off (8).

TP Documenter

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



The screenshot displays the 'Calculation Results' dashboard for 'Handy Home'. Key metrics include: Total Top-up Tax of \$1049.3M, Total GloBE Income of \$25000.0M, and Average ETR of 16.80%. A 'Jurisdiction' indicator shows 4 jurisdictions. Below the metrics are three charts: 'Effective Tax Rate by Jurisdiction' (a bar chart), 'Top-up Tax Distribution' (a pie chart), and 'Detailed Results by Jurisdiction' (a table). An 'Allocation Summary' section at the bottom right shows QDMTT values for UK, JP, and FR.

COUNTRY	GLOBE INCOME	COVERED TAXES	ETR	STATUS	SUBSTANCE EXCLUSION	TOP-UP TAX	ALLOCATION	REPORT
AU	\$10000.0M	\$3000.0M	30.00%	Above Minimum	\$15.0M	\$0.0M	IIR parent-001	Report
UK	\$2000.0M	\$100.0M	5.00%	Below Minimum	\$2.3M	\$199.8M	QDMTT UK	Report
JP	\$4000.0M	\$250.0M	6.25%	Below Minimum	\$2.3M	\$349.8M	QDMTT JP	Report
FR	\$4000.0M	\$250.0M	6.25%	Below Minimum	\$2.3M	\$349.8M	QDMTT FR	Report
CA	\$5000.0M	\$600.0M	12.00%	Below Minimum	\$2.3M	\$149.9M	IIR parent-001	Report



P2 Simulator

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

The screenshot shows the 'TRM (Tax Risk Manager)' interface. A central message states 'TRM Module Under Development' and explains that the team is working on bringing the TRM (Tax Risk Management) module to the user. It includes a 'Development in progress...' indicator and a 'Questions?' section with a link to contact support.

TRM (Tax Risk Manager)

Identify and monitor exposures, track compliance gaps, and gain insights to strengthen tax governance and decision-making.



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.

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

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

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 commissions?
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 Q6 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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