

LeitnerLeitner established a new transfer pricing business line led by a new colleague

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As of April 2018 Ágnes Fotiadi joined LeitnerLeitner as the leader of the newly established transfer pricing business line. She has so far headed the Transfer Pricing Unit of the Hungarian Tax and Customs Administration from its establishment. Due to her work, the field has become an internationally recognized area within the Hungarian Tax Authority.

Ágnes Fotiadi was responsible in the Hungarian Tax Authority for evaluating and analysing data of multinational enterprises, database studies, income calculations, controlling and preparing transfer pricing documentation, benchmark studies and methodologies. She has appraised the Advance Pricing Arrangements (APAs) with country-wide competence, has conducted negotiations in Mutual Agreement Procedures (MAPs) on transfer pricing, and lead the Hungarian delegations in such cross-border co-operations. She was an active participant in the work of a number of international organizations such as the WP6 Working Party of the OECD and the European Union's Committee for Taxation. She dealt with the transfer pricing of multinational companies in these bodies.

LeitnerLeitner's Transfer Pricing Business Unit offers the following services:

- preparation and review of transfer pricing documentation
- preparation or localization of the new types of three-tier documentation
 - country-by-country reports
 - master files
 - country files
- APA: preparation of Advanced Pricing Agreement requests and representation during the whole procedure
- MAP: representation of multinational enterprises in the cross-border negotiations for Mutual Agreement Procedures
- assistance in transfer pricing audits, providing remedies (comments, appeals against Tax Authority challenges)
- transfer pricing expert activity: designing the transfer pricing structure within a company group, creating and introduction of transfer pricing policies, and providing additional transfer pricing advisory.

As reflected by all the above, LeitnerLeitner pays special attention to the increasingly complex transfer pricing obligations, as concluding from the BEPS project the OECD Transfer Pricing Guidelines further tightened these. With its complex service package, LeitnerLeitner aims to help the companies affiliated in Hungary and internationally to succeed in meeting the new challenges: create immeasurable transfer pricing records, leverage value-based, functional and risk analyses, support profitability calculations, which can contribute also to reach a more economical and rational operation. LeitnerLeitner's transfer pricing business line supports its Clients with database studies, benchmark analyses to seamlessly adopt the new three-tier transfer pricing documentation requirements from 2018.

LeitnerLeitner is one of the most influential advisory firms in CEE for taxes, accounting and audit. With 11 offices, over 50 years of experience and 750 skilled colleagues, it provides the best synergies for Clients. Since 2018, as a member of Taxand, LeitnerLeitner offers its services globally.

Please feel free to contact us with your questions!

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