

vstn Consultancy



VSTN

The Transfer Pricing
Experts



ABOUT US

VSTN Consultancy Private Ltd is a boutique Transfer pricing firm with extensive expertise in the field of international taxation and transfer pricing, and has been recognised by **International Tax Review (ITR)** as one of the **finest performing transfer pricing firms**.

Our offering spans the end-to-end Transfer Pricing value chain, including design of intercompany policy, drafting of Interco agreement, ensuring effective implementation of the Transfer Pricing policy, year-end documentation and certification, BEPS related compliances (including advisory, Masterfile, Country by Country report), safe harbour filing, audit defence before all forums and dispute prevention mechanisms such as Advance Pricing agreement.

We are structured as an inverse pyramid where leadership get involved in all client matters, enabling clients to receive the highest quality of service.

Being a specialized firm, we offer advice that is independent of an audit practice, and deliver it with an uncompromising integrity.

Our expert team brings in cumulative experience of over six decades in the transfer pricing space having worked with multiple Multinational Companies across sectors/industries in the Big 4 and have cutting edge knowledge and capabilities in handling complex TP engagements.

We periodically publish technical content including latest key developments in transfer pricing through Alerts and posts.

We have been shortlisted as finalist for “**Asia Pacific Transfer Pricing Firm of the Year award**” by **International Tax Review (ITR)** for 2024

OUR SERVICES

Transfer Pricing Advisory

- Designing Intercompany Policy
- Drafting Intercompany Agreements
- Price setting through Benchmarking
- Tax efficient structuring of international Transactions (Tangible, Intangible, Financing, Services) and transaction flows

Benchmarking (India & Global)

- Conduct Searches in databases to identify appropriate comparables as that of the Tax payer

Transfer Pricing Documentation and Form 3CEB

- Preparation of detailed Transfer Pricing documentation (local file) where the value of the international transaction / specified domestic transaction exceeds threshold
- Issuance of Accountant's report in Form 3CEB by a Chartered Accountant irrespective of any threshold

BEPS Related Services

- Preparation of masterfile in accordance with the country regulations
- Support for country by country reporting where the consolidated Turnover of the Multinational Group exceeds EUR 750 million (INR 6400 crores)
- Risk assessment of the Group's transactions based on the key parameters
- IP Structuring/ DEMPE Analysis
- Pillar 1 & Pillar 2 Impact Analysis

Safe Harbour

- Evaluating the applicability, consequent filing of safe harbor application (Form 3CEFA) and subsequent representation before the tax authorities

Global Documentation

- Preparation of Local files for various countries including Benchmarking using global databases.

Litigation

- Audit defense before all forums - Transfer Pricing officer, Dispute Resolution Panel, Commissioner of Income Tax (Appeals) and Income Tax Appellate Tribunal
- Formulate audit defense strategy, preparation of submissions / appeal documents, briefing of senior counsel, in case of High Court & Supreme Court

Advance Pricing Agreements / Mutual Agreement Procedure

- Proactive way to eliminate future litigation for covered transactions once the agreement is signed between the CBDT and the Tax payer, for 5 forward looking and 4 rollback years. We offer end to end support on APA including post conclusion support, filing of annual compliance report and audit
- Support in MAP related submissions

Due Diligence

- Review of business model, intercompany transaction, previous years' documents, TP orders, agreements, audit positions taken and offer advice to reduce the risk exposure

Other Services

- Management side review & support
- TP comfort letters / Memo for auditors
- FIN 48 assistance – quantification of TP exposure on uncertain tax positions
- Related party compliances arising on account of SEBI Listing Obligations, Disclosure Requirements & Companies Act requirement
- Need benefit test documentation for intra group payments - Royalty and Management charges

LEADERSHIP



+91 99620 12244

snithya@vstnconsultancy.com

We have a team of experts who have decades of experience in Transfer Pricing and will support client engagements under the leadership of Nithya Srinivasan.

Nithya Srinivasan has more than 19 years of experience with over 17 years in Transfer Pricing including with Big4s (Deloitte & PwC), advising multinational corporations and providing practical transfer pricing solutions. She has extensive experience managing transfer pricing compliance, litigation, APAs, complex planning assignments for High profile MNCs. She also specializes in dealing with tax authorities on wide variety of transfer pricing issues including marketing intangibles, share valuation, risk adjustments, start-up losses, adoption of statistical techniques to address transfer pricing problems.

She was involved in development of dynamic transfer pricing policies for clients, including supply chain structuring, business model conversions. She has led Base Erosion Profit Shifting (BEPS) initiative for major India HQs.

Nithya has authored articles for publication in International Fiscal Association (“IFA”) journal, International Tax review, Tax sutra, NDTV, co-authored a book titled “Transfer Pricing Law and Practice in India including BEPS” published by CCH and also co-authored for the BCAJ Journal on “Transfer Pricing in the Automotive sector”. Nithya has coauthored a research paper published in the International Organization of Scientific Research (IOSR) - Journal of Economics and Finance on Indian Transfer Pricing landscape.

She has been recognised as a “Highly Regarded” Practitioner by the **International Tax Review (ITR)** in World Tax Rankings. She has been nominated for the “APAC Transfer Pricing Practice Leader of the year award” by **ITR** – 2024.

SENIOR TEAM PROFILE



+91 98407 45660

srilakshmih@vstnconsultancy.com

Srilakshmi Hariharan has over 19 years of corporate experience inclusive of 12 years in Transfer Pricing with Big 4s and Multinational companies including PwC, Shell India Markets Pvt Ltd, Deloitte and Crowe Howarth. She specialises in handling Transfer Pricing Audits, Compliance documentation and Assessments apart from assisting clients in APA Process. She also has vast experience in advising clients on complex intercompany transactions and compliance documentation relating to cost sharing arrangements, intra group services, management charges, Treasury transactions, drafting of intercompany agreements and analysing PE exposure on proposed / existing transactions.

She has also assisted clients on a number of planning assignments aiding them in setting up of arm's length mark-up for the new business/transactions. Her Corporate Exposure has also gained her experience in handling compliance documentation for entities in Asia Pacific and European countries apart from India.



+91 79779 09384

chitrars@vstnconsultancy.com

Chitra Subramanian is a Cost Accountant with a MBA in Finance. She is a Senior Finance professional with 18+ years of experience in leading Finance, Tax, Accounting and Commercial Operations across various industries.

She has over 14+ years of expertise in Transfer Pricing with the Big4 and Industry. Her acumen extends across the spectrum of transfer pricing, encompassing meticulous management of compliance, facilitation of Advance Pricing Agreements (APAs), Advisory including formulating transfer pricing policies, encompassing intricate business restructuring and innovative business model transformations. She has handled litigation before various levels of tax/appellate authorities on issues including marketing intangibles, risk adjustments, etc.

She has supported several prominent MNE Groups in their Master file and Country-by-country report compliances. Chitra has authored articles on several renowned platforms.



+91 98404 70708

ranjani@vstnconsultancy.com

S. Ranjani has around 11 years of experience in Transfer Pricing with over 7 years with Deloitte working on various engagements and assisting the clients with their Transfer pricing compliances and litigation. She also played an inhouse Tax and TP role for Auto major – Daimler for around 3 years. She has considerable experience managing transfer pricing compliance, litigation, APAs, advisory assignments for High profile MNCs. The variety of transfer pricing issues handled includes marketing intangibles, economic adjustments, loss making entities, etc.,

She has closely worked on the Masterfile and Country by Country filing requirements of high profile MNCs and for major India HQs. She has co-authored articles for publication in International Fiscal Association (“IFA”) journal, International Tax review, and co-authored a book titled “Transfer Pricing Law and Practice in India including BEPS” published by CCH and also co-authored for the BCAJ Journal on “Transfer Pricing in the Automotive sector”.

She has been nominated for “APAC Transfer Pricing Rising Star award” by **International Tax Review (ITR)** for 2024



+91 70928 04741

rajeshe@vstnconsultancy.com

E. Rajesh has over 9 years of transfer pricing experience with Deloitte by supporting MNEs in their transfer pricing life cycle including advisory in price setting for various transactions, evaluating alternate business models, review of existing intra-group transactions, preparation of local file, filing Accountant’s report, opting for safe harbour rules and advance pricing agreements.

Rajesh was key in onboarding BEPS compliances – Master file and Country-by-Country report for major South Indian conglomerates. Rajesh has authored articles published in various forums including TaxSutra – Interplay of Statistics and Transfer Pricing, as well as published research papers in IOSR – JEF on Indian Transfer Pricing. Rajesh has participated and won in an Olympiad conducted for the Indian transfer pricing practice in Deloitte for crowdsourcing tax ideation.



+91 98407 84693

nityajoseph@vstnconsultancy.com

Nitya Joseph has around 8 years of experience in Transfer Pricing with over 5 years with Deloitte working on various engagements and assisting the clients with their Transfer pricing compliances and litigation. She has substantial experience managing transfer pricing compliance for international and specified domestic transactions, litigation, advisory assignments for High profile MNCs across manufacturing, trading and services industries.

She has assisted in filing and conclusion of APAs and Safe Harbour applications for clients, and was involved in planning assignments for financial transactions. She has closely dealt with tax authorities and assisted in representation before the Tax Tribunal on various issues including intra-group charges, proportionate adjustment, economic adjustments, loss making entities etc.

VSTN CLIENTELE

US HQ Digital transformation Co

- ▶ Transaction Structuring –TP alignment for US & Europe
- ▶ Exit charge evaluation
- ▶ Global Documentation

German HQ Listed Industrial Mfg.

- ▶ Transfer Pricing Document

Global Integrated Shipping Group

- ▶ Transfer Pricing Document
- ▶ TP assessment / Audit

World's Largest MVNO

- ▶ Transfer Pricing Documentation
- ▶ US price setting study

Leader in Digital transformation

- ▶ Transfer Pricing Document
- ▶ Intra group agreement Review

Indian GCC – US Listed

- ▶ Price setting for financial transaction

US Battery Manufacturing

- ▶ TP Planning
- ▶ Transfer Pricing Document

KSA Intelligent transport system & Filtration system Mfg

- ▶ Local File Review and Benchmarking Study

Leading Lingerie Swiss Co

- ▶ Management side review
- ▶ Master File Compliance
- ▶ Compliance - Foreign Entities

Leading Korean Car Manufacturer

- ▶ Transfer Pricing Compliance

Leading Indian Auto Ancillary Co

- ▶ Royalty Benchmarking study
- ▶ TP assessment including management fee documentation

Leading Industrial Engineering Co

- ▶ Transfer Pricing Advisory

M. East Recognised production studio

- ▶ TP Planning
- ▶ Intra group agreement Review

Listed Pharma Co.

- ▶ Drafting Global TP policy
- ▶ Management side review - Tax consultant work

US Smart Freight Forwarding Co.

- ▶ TP Planning
- ▶ Intra group agreement Review

US HQ Smart Kiosk Group

- ▶ Document for Safe Harbour

Leading Payday loan Group - UK

- ▶ Transfer Pricing Compliance
- ▶ Planning Study
- ▶ UK Benchmarking Study

US Leader in Device and access

- ▶ Transfer Pricing Compliance
- ▶ Planning Study – 4 countries
- ▶ Global Documentation – multiple countries

Leading Indian Global Payroll Co.

- ▶ India, US & Denmark – Local File
- ▶ TP Advisory incl. Masterfile

Listed IT Company

- ▶ Price setting for various transactions including Guarantees

UAE – Mobile Technology Co.

- ▶ Pricing setting for various related party transactions including KMP benchmarking

UAE – Building Systems

- ▶ Pricing setting for various related party transactions

KSA – EPCM for Electrical Systems

- ▶ Preparation of Local File and Benchmarking Studies

UAE – Signage Solutions

- ▶ Preparation of Local File and Benchmarking Studies

CONTACT US



📍 Chennai

Shakti towers, Tower A, Door C1,
4th floor, Annasalai,
Chennai 600002

📍 Mumbai

Wadhwa Atmosphere,
Mulund Goregon Link Road
Mulund West, Mumbai 400080

📞 +91 99620 12244



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