

vstn Consultancy
Global Transfer Pricing Firm

2025

VSTN
THE TRANSFER
PRICING EXPERTS



Our Awards & Recognitions



ABOUT US

VSTN Consultancy is a Global Transfer Pricing firm with extensive expertise in the field of international taxation and transfer pricing having its offices in India and UAE. VSTN Consultancy has been awarded by **International Tax Review (ITR)** as **Best Newcomer** in Asia Pacific – 2024 and is recognized as one of the finest performing transfer pricing firms. VSTN Consultancy has been shortlisted in 9 awards as finalist by ITR for Tax Innovator, Tax Compliance and Reporting Firm, Transfer Pricing Leader , Transfer Pricing Rising Star in Asia Pacific – 2025 | Best Newcomer, Tax Innovator and Transfer Pricing Leader in EMEA – 2025 | Best Newcomer and Transfer Pricing Leader in the Middle East – 2025.

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, Global Transfer Pricing Documentation, BEPS related compliances (including advisory, Masterfile, Country by Country report), safe harbor filing, audit defense 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 several decades in the transfer pricing space having worked with multiple Multinational Companies across sectors/industries and have cutting edge knowledge and capabilities in handling complex TP engagements.

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



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



GLOBAL DOCUMENTATION

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



BENCHMARKING (INDIA & GLOBAL)

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



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

OUR SERVICES



SAFE HARBOUR

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



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



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



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

OUR TEAM

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, founder of VSTN has 20+ years of experience in Transfer Pricing 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 co-authored a research paper published in the International Organization of Scientific Research (IO SR) – 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, Middle East and EMEA Transfer Pricing Practice Leader of the year award”** by **International Tax Review (ITR)**.



 +91 99620 12244

 snithya@vstnconsultancy.com

OUR TEAM



Srilakshmi Hariharan has over 20 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 98407 45660

 srilakshmih@vstnconsultancy.com



S. Ranjani has around 13 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 98404 60708

 ranjani@vstnconsultancy.com



E. Rajesh has over 11 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.

He has been nominated for “APAC Transfer Pricing Rising Star award” by **International Tax Review (ITR)** for 2025.

 +91 70928 04741

 rajeshe@vstnconsultancy.com

OUR TEAM



Nitya Joseph has around 10 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.

 +91 98407 84693

 nityajoseph@vstnconsultancy.com



Saranya Nagarajan has around 12 years of experience in handling Transfer Pricing related matters in industry and Big4 (Deloitte). She has hands on experience in managing transfer pricing compliance including Local File, Master File and Country-by-Country reporting. She has handled transfer pricing litigations before tax/appellate authorities involving several issues including economic adjustments, intra-group services, etc.

Saranya has dealt with various Indian and multi-national clients and has been extensively involved in planning studies, agreement reviews, health check-ups and other transfer pricing advisory services.

She is a qualified Chartered Accountant, a qualified Company Secretary and holds a certification in Transfer Pricing issued by the Chartered Institute of Taxation, UK.

 +91 99413 78112

 saranya@vstnconsultancy.com



Triveni Palla has over 14 years of experience in handling transfer pricing related matters. She has a decade of experience in handling transfer pricing matters in Big4s such as PwC India and Deloitte India and based in Hyderabad.

She has hands on experience in serving the clients in variety of transfer pricing matters including transfer pricing compliance, litigation, master file, safe harbour, planning, transaction structuring, global documentation, Advance Pricing Agreements, BEPS advisory, health check-ups, intra-group services, operational transfer pricing advisory and implementation etc.

She has extensive experience in serving clientele in variety of industries such as Information Technology, Aerospace, Pharma, Telecommunication, Cement Manufacturing, Semiconductor etc.

Triveni Palla is a qualified Chartered Accountant from the Institute of Chartered Accountants of India.

 +91 97012 33010

 trivenipalla@vstnconsultancy.com

GLOBAL LOCATIONS SERVED

 USA

 Zambia

 Australia

 Philippines

 Netherlands

 Mexico

 UAE

 Turkey

 Switzerland

 Italy

 India

 Denmark

 Canada

 Belgium

 Singapore

 UK

 KSA

GLOBAL DATABASE ACCESS

To ensure accuracy, defensibility, and global compliance in Transfer Pricing, **VSTN Consultancy — a Global Transfer Pricing Firm** — leverages a suite of leading international databases.

- ✓ TP Catalyst (Moody's)

✓ Loan Module (Moody's)

✓ IP & Royalty Data (Moody's)

✓ Prowess (CMIE)
- ✓ ORBIS (Moody's)

✓ EDF-X Bond Database (Moody's)

✓ EDF-X Credit Risk Analytics (Moody's)

✓ Royalty Benchmarking (Royalty Range)
- ✓ ORBIS (Moody's)

✓ Services CUT (ktMINE)

✓ Transfer Pricing Documenter (Onesource) (Ryan)

CONTACT US



INDIA

Chennai

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



+91 99620 12244



UAE

Dubai

Office 203 Mezzanine Floor,
IDS Building Al karama,
Dubai – United Arab Emirates



+971 58 305 3317



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