



# Transfer Pricing Around the World - Increasingly Controversial

June 12, 2024

**Ahead  
of the Wave**

2024 U.S. Cross-Border Tax Conference



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# With you today

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# Agenda

## Transfer pricing controversy trends

- Strategy
- Data
- Key Issues

## Spotlight

- Colombia
- Germany
- Mexico
- Australia

## Certainty

- Procedural options
- Considerations

## Key Takeaways



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