



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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