



**Intercompany Agreements for Transfer Pricing Compliance**  
LCN Legal support options for multinational  
groups and their advisers

**Packages and prices**

## Intercompany Agreements for Transfer Pricing Compliance

### LCN Legal support options for multinational groups and their advisers

- **LCN Legal Online Course in Intercompany Agreements (ICAs) for Transfer Pricing Compliance:**

Our online learning course is designed for Tax and Transfer Pricing professionals and lawyers in private practice and within Multinational Groups. It consists of 10 recorded webinars of 45 to 60 minutes' duration each, and is followed by self-assessment questionnaires so that participants can check their understanding of the course materials. A Q&A facility is also available to course participants. The course is listed by the UK's Chartered Institute of Tax (CIOT) as part of the 'International Tax' and 'Transfer Pricing' modules of the CIOT's Advanced Diploma in International Taxation.

*Price GBP 1,950 (plus VAT) for first participant, and GBP 950 for additional participants from the same organisation. Course participants receive a copy of LCN Legal's recently published book, a seminal Guide to Intercompany Agreements for Transfer Pricing Compliance, published by Law Brief Publishing. Participants also receive 50% discount on the standard price of the ICA Toolkit (see below)*

- **Bespoke Training Sessions:**

For in-house tax, transfer pricing, legal and compliance teams, and also for transfer pricing advisers and related service providers, we design and facilitate workshops and training sessions to help ensure a clear understanding of the importance of creating and maintaining an appropriate global system of intercompany agreements. These sessions provide practical and bespoke guidance on what your teams need to do to achieve this, and how to avoid common costly mistakes.

*Prices from GBP 1,750 (plus VAT) for webinars and GBP 3,900 for in-person workshops and seminars (for up to 50 participants), plus travel time and costs.*

- **Toolkit of Template Intercompany Agreements:**

We provide access to our OECD compliant library of tried-and-tested template Intercompany Agreements, including pricing provisions based on OECD pricing models and other related documents.

*Price GBP 3,850, plus VAT. 50% discount offered to participants of the ICA Course (see above).*

- **Access to LCN Legal's Document Automation tools:**

A suite of document automation tools for creating best-in-class Intercompany Agreements for the most common intercompany transaction types. You complete a straight-forward online questionnaire which typically takes just 5 to 10 minutes. The system generates a tailored agreement which is delivered to you by email upon payment, based on the information you have provided. Each agreement is provided in Microsoft Word format and is fully editable.

This new 'execution only' service currently covers the following transaction types:

- Business support services charged on a cost plus basis, such as central support services, marketing services, R&D services, procurement services etc (bilingual version producing English / Chinese agreements also available)

- Appointment of limited risk distributor or local sales entity, remunerated on a TNMM basis
- Intellectual property licence / royalty agreement
- Lead contractor / support services arrangement
- Loan agreement (term loan / revolving credit facility / overdraft facility)

*Prices and licensing terms available on application.*

• **Traffic Light Review of Existing Intercompany Agreements:**

We review samples of your existing Intercompany Agreements for the key transaction types you consider to present the highest risk of transfer pricing challenge for your group.

*Price GBP 4,750 (plus VAT) per sample ICA reviewed. Discounts offered for multiple reviews.*

• **Design of Intercompany Agreements, tailored for each transaction type:**

We review your transfer pricing policies and documentation, and create appropriate and OECD compliant Intercompany Agreements for each key transaction type. Fixed prices assume that our work can be completed within one month. We can also help with the implementation of ICAs, by creating the individual agreements which are needed and by arranging signatures (including electronically).

*Prices from GBP 4,950, plus VAT, for the first template agreement and GBP 3,960, plus VAT, for each additional ICA, plus implementation costs (if applicable). Fixed prices are subject to confirmation depending on the volume of the background information to be reviewed.*

• **Full-Service Design, Implementation and Maintenance of Intercompany Agreements and related Corporate Structuring Projects:**

For multinational groups that want the reassurance of knowing that their Intercompany Agreements have been designed and implemented by specialists and comply with relevant OECD guidance and all applicable local laws, we offer full service legal support. This includes the legal design of Intercompany Agreements, hands-on support with due diligence and implementation, and ongoing review and maintenance of Intercompany Agreements. Includes support on other special projects, such as planning and implementing the legal aspects of business (debt, asset and entity) restructurings, or corrective actions which are required for ongoing or pending investigations from tax authorities.

*Prices depend on the complexity of the group and the project scope.*

• **Virtual Legal Director Service:**

For organisations which need pro-active management of their legal affairs, regulatory compliance or special projects, but do not want the time commitment and compliance burden of recruiting, on-boarding and managing additional senior employees. Subscribers benefit from the support of a dedicated senior lawyer within the LCN Legal team on a retainer basis, for example for the equivalent of 1, 2 or 3 days per week. Significant discounts available compared to standard hourly rates. No long-term tie-in.

*Prices and discounts available on application.*

**Note:** *Prices exclude VAT which is payable in addition at the applicable rate.*