

New from LCN Legal: **Fast Track Intercompany Agreement (ICA)** **Automation for Transfer Pricing Compliance**





A document automation platform for creating best-in-class intercompany agreements for the most common intercompany transaction types.


Many multinational groups struggle to put in place the contemporaneous, tax-audit ready intercompany agreements they need to support their transfer pricing policies. Typically, this is due to a number of factors such as lack of time, lack of budget and lack of specialist legal expertise. The result is that those groups are exposed to unnecessary risks including:

- **inadequate TP compliance and documentation;**
- **adverse TP adjustments, due to failure to legally implement their TP policies; and**
- **finances and penalties.**

In response to this issue, LCN Legal, the World leaders in creating legal substance for transfer pricing compliance, has created a faster and more cost-effective way to allow transfer pricing and tax professionals to create effective intercompany agreements for their multinational clients, without giving legal advice for which they are not qualified or licenced.

What advantages does the Fast Track ICA service offer, compared to the standard method of drafting ICAs?

-  **Cost effective** – prices start from US\$ 2,125 / £ 1,750 per agreement, plus VAT (if applicable)
-  **Fast** – drafts are available within 2-4 business days
-  **Efficient** – leverages the information already held by transfer pricing advisers or in-house tax teams. Avoids the time typically taken to brief lawyers who are not familiar with transfer pricing
-  **Effective** – agreements benefit from LCN Legal's world-leading expertise in intercompany agreements and feedback from a global community of leading transfer pricing professionals

Specialist assistance with ICAs for more complex supply chain and pricing structures (e.g., profit splits) and corporate restructuring is available in addition to the Fast Track ICA Service. 

Meet the team at our stand:



Paul Sutton
Co-Founder



Xiaofang Sutton
Co-Founder



Ivan Hanna
Director



Leiza Bladd-Symms
Associate Director



Andrew Shepherd
Corporate Relationship Manager

What is the new Fast Track ICA Service?



An online platform allowing the production of tailored intercompany agreements (ICAs) within 2-4 business days. The platform currently generates agreements for standard transaction types, including:

- Business support services charged on a cost plus basis such as:
 - Central support services
 - Procurement services
 - Logistics services
 - Marketing services
 - R&D services
- Intellectual property (IP) licences and royalties
- Appointment of limited risk distributors / sales entities remunerated on a TNMM basis
- Intercompany loan agreements

Additional transaction types are under development and will soon be available.

Agreement functionality includes:

- Single and multiple service recipients
- Bilateral and multilateral agreement formats
- Retroactive agreements (to the extent possible)
- Allocation of contractual risk between the parties
- Ownership of IP, including in work products
- Allocating control over delivery of services
- Multiple cost keys
- Multiple allocation keys
- Payment terms and interim payments
- Post year-end true up provisions
- Options for treatment of default interest

Automated translations (currently available in Chinese for business support services).





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How does the Fast Track ICA service work?

3 simple steps:



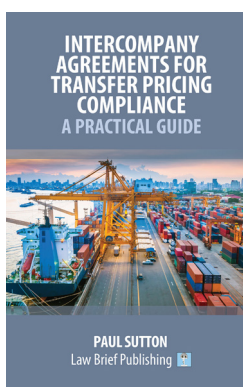
If you are unsure about your answers to the questionnaire, call us and we can talk you through it.

Who are LCN Legal?

LCN Legal are world leaders in intercompany agreements for transfer pricing compliance and associated corporate structures and reorganisations. The company was established in 2013 and is headquartered in London, UK. We are currently opening a China office. We work with multinational clients and leading transfer pricing advisers globally.

In May 2019 we published the seminal book on the subject: *'Intercompany Agreements for Transfer Pricing – A Practical Guide'*. Earlier this year we also launched our ground-breaking Online Course in Intercompany Agreements for Transfer Pricing Compliance (10 module/week course – standard price GBP 1,950 per delegate, plus VAT if applicable). Our course has already been attended by many household name multinationals and is listed by the UK's Chartered Institute of Taxation (CIOT) in connection with its 'Advanced Diploma in International Taxation'.

We don't provide tax advice, functional analysis, value chain analysis or benchmarking reports – so we work alongside, rather than in competition with, tax and transfer pricing professionals.



Limited-time special offers, exclusively for attendees of TP Minds Asia 2019

To celebrate the opening of our new China office, we have created the following special offers:

- A free trial of our 'Fast Track' service for business support services applying cost plus pricing, and create a bilingual English / Chinese agreement for free (usual price £1,850 plus VAT)
- A discount of US\$ 600 / £ 500 per agreement for any additional orders of agreements using our Fast Track ICA service

Offers end 26 September 2019.

To claim your free trial and discounts, visit our stand at TP Minds Asia or email us at FastTrackICA@lcnlegal.com and quote 'TP Minds Asia 2019' in the subject line of the email.



How to find out more and purchase

For more information:

- Visit our stand at TP Minds Asia and participate in a free trial of the Fast Track ICA Service on the day
- Participate in our Workshop in the **Paprika Room** on **level 5**.
- Contact us at FastTrackICA@lcnlegal.com or (+44) 203 286 8868

Workshop C: Intercompany agreements (ICAs) for Transfer Pricing Compliance: how to create and maintain tax-audit ready ICAs.
Tuesday 24th September at 1600-1730 in the Paprika Room on level 5.

"I like the questionnaire a lot. The [ICA] is right up there in terms of any agreements I have seen."

Transfer Pricing Director,
commenting on our
Fast Track ICA Service