

Taking stock of transfer pricing technologies available today

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Transfer pricing is an ever-growing area of interest for tax authorities, multinational enterprises, and international organizations such as the OECD and UN. With new guidelines just released by the OECD in January 2022 and nations still grappling with how to address the taxation of the digital economy, taxpayers today are faced with more complex transfer pricing compliance requirements and tax risk than ever before.

Fortunately, in recent years, transfer pricing-oriented technology solutions have become increasingly sophisticated and beneficial. Technology solutions can now assist a multinational with automatically gathering transfer pricing data, running analytics, performing complex calculations, reporting mandatory tax disclosures, preparing transfer pricing documentation, updating benchmarks, producing intercompany agreements, and can now even integrate into other systems to not just monitor, but to control, transfer pricing entries, invoicing, and settlement. It's not hard to imagine a time in the future when the use of transfer pricing technology solutions becomes the norm in most multinational corporations.

Grant Thornton LLP has compiled a list of available technology solutions that can assist with various elements of operational transfer pricing. The list is not exhaustive but represents a summary of the most popular offerings in the market today. For ease of reference, we have categorized the solutions according to functionality, and provided a summary of key highlights.

The functional categories include:

Transfer Pricing Documentation	Technology solutions that produce transfer pricing documentation.
Transaction Automation and Analytics	Technology solutions that include custom automation, analytics, and transaction calculation capabilities.
CbCR	Technology solutions that produce CbC reports.
Benchmarking	Technology solutions that produce benchmarking analyses.
Intercompany Agreements	Technology solutions that produce and maintain intercompany agreements.
MDR and DAC6	Technology solutions that produce and maintain mandatory disclosure requirement and DAC6 reporting.

#	Provider	Technology	Capabilities	Highlights
1	Aibidia	Aibidia	<ul style="list-style-type: none"> • TP Documentation • CbCr • Transaction Automation and Analytics 	<ul style="list-style-type: none"> • The platform covers a breadth of global transfer pricing compliance and operational processes to help automate and digitalize intercompany cross-border transactions. • Includes complete TP documentation and CbC reporting solutions to comply with global reporting requirements.
2	Bureau Van DIJK	TP Catalyst	<ul style="list-style-type: none"> • Benchmarking • Transaction Automation and Analytics 	<ul style="list-style-type: none"> • Tool can be used to identify comparables, derive benchmarks, and make TP adjustments. • Assists in profit and transaction-based analysis.
3	Bureau Van DIJK	TP Document Manager	<ul style="list-style-type: none"> • TP Documentation • CbCr 	<ul style="list-style-type: none"> • Creates TP documentation, including master file, local files, and CbCR incorporates local TP legislation summaries from the International Bureau of Fiscal Documentation (IBFD) to simplify the preparation of local documentation. • Integrates TP documentation and regulatory requirements from most tax jurisdictions.
4	CrossBorder Solutions	TP Compliance	<ul style="list-style-type: none"> • TP Documentation • Benchmarking 	<ul style="list-style-type: none"> • This tool assists in preparing local documentation, local benchmarking searches and automatic updates. • Uses AI technology that can leverage existing transfer pricing work for localized compliance. AI reads existing transfer pricing study, prepares a gap analysis, and localizes the study to meet a given country's regulations.
5	Cross Border Analytics	XBA	<ul style="list-style-type: none"> • Transaction Automation and Analytics 	<ul style="list-style-type: none"> • Offers automation and the ability to incorporate advanced transfer pricing economics, risk management and reporting processes into an integrated system.
6	Deloitte	Digital DoX	<ul style="list-style-type: none"> • TP Documentation 	<ul style="list-style-type: none"> • Focused on generating transfer pricing reports. • Enables flexible collaboration between internal and external users.
7	EY	TP Web	<ul style="list-style-type: none"> • TP Documentation 	<ul style="list-style-type: none"> • Focused on generating transfer pricing reports. • Streamlines internal processes and generates reporting packages to support documentation requirements.
8	EY	CbCR Web	<ul style="list-style-type: none"> • CbCr 	<ul style="list-style-type: none"> • Assists with compiling CbC reporting data and filing CbC Reports.
9	Grant Thornton	inter.x	<ul style="list-style-type: none"> • Transaction Automation and Analytics 	<ul style="list-style-type: none"> • Focused on transaction automation and analytics. • Uses a blockchain audit trail that tracks and accounts for intercompany transactions and policy compliance.

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10	Insightsoftware	Country by Country Reporting software	<ul style="list-style-type: none"> CbCr 	<ul style="list-style-type: none"> Aligns accounting values with required outputs, and extracts data in XML and Excel formats that meet CbC reporting requirements. Provides options to create, analyze, and compare scenarios before finalizing reporting within a dedicated compliance period.
11	Intra Pricing Solutions	TPGenie	<ul style="list-style-type: none"> TP Documentation CbCr Intercompany Agreements Benchmarking 	<ul style="list-style-type: none"> The CbCR tool creates a BEPS Action 13 CbCR in the XML format according to specifications of the OECD and affiliated countries. Assists in creating, updating and managing transfer pricing documentation, including Master file, Local files, Intercompany Agreements, Benchmarking databases and Country-by-Country Reporting.
12	KPMG	TP Cube	<ul style="list-style-type: none"> Transaction Automation and Analytics 	<ul style="list-style-type: none"> This tool assists in calculating cost recharges and can generate invoices to group entities. Allows allocation and classification of data based on allocation keys and calculation of transfer pricing values. Allows modelling and carrying out “what if” scenarios.
13	Longview	Longview Transfer Pricing	<ul style="list-style-type: none"> Transaction Automation and Analytics 	<ul style="list-style-type: none"> Flexible tool that extracts data from ERP and automates preparation of transaction calculations and other data. Includes advanced analytics and scenario modelling capabilities.
14	Nicetec	InsighTPro	<ul style="list-style-type: none"> Transaction Automation and Analytics 	<ul style="list-style-type: none"> Provides project management capability and is focused on automating intra-group service price calculation and billing.
15	Optravis	Transfer Pricing Management Tool	<ul style="list-style-type: none"> Transaction Automation and Analytics 	<ul style="list-style-type: none"> Provides segmented P&L reporting and allocation of SG&A's/OPEX costs capability. Provides automated calculation of transfer prices and real-time impact simulation on product level.
16	Otico Software	TP Controller	<ul style="list-style-type: none"> CbCr 	<ul style="list-style-type: none"> Assists in automation of sharing of global TP data and generating CBCR reports in the OECD approved format.
17	PlaidCloud	The PlaidCloud Goods Transfer Pricing Solution	<ul style="list-style-type: none"> Transaction Automation and Analytics 	<ul style="list-style-type: none"> Automates transfer price calculations for by collecting data, segmenting financials, assessing profitability, and performing adjustments. Provides insights that can be used in CbCr reporting.

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18	PWC	TP3	<ul style="list-style-type: none"> TP Documentation 	<ul style="list-style-type: none"> Web-based tool for organizing and storing TP documentation and related information. Provides a framework for organizing knowledge about TP planning, documentation and defense related issues.
19	Quanterra Global	Coperitas	<ul style="list-style-type: none"> TP Documentation CbCr Intercompany Agreements Transaction Automation and Analytics 	<ul style="list-style-type: none"> Assists in monitoring transfer pricing margins, deadlines and expiring documents. Generates TP reports, intercompany agreements. Stores CbCR data and provides insight in possible risk areas.
20	Reptune	Reptune	<ul style="list-style-type: none"> TP Documentation 	<ul style="list-style-type: none"> Focused on generating modular transfer pricing documentation. Provides visual insight into transaction flows, documentation progress and financial performance.
21	TaxModel	TaxModel	<ul style="list-style-type: none"> TP Documentation Benchmarking CbCr MDR AND DAC6 	<ul style="list-style-type: none"> TPbenchmark assists in automating the benchmarking process. TPcbc offers OECD CBCr templates (MS Excel-based), to be completed by/for the reporting company. TPdoc provides transfer pricing documentation workstreams and features a Word document plug-in for building OECD-compliant Master files and Local files. DAC6pro assists with the MDR AND DAC6 compliance process.
22	Taxtimbre	Taxtimbre	<ul style="list-style-type: none"> TP Documentation Benchmarking Intercompany agreements CbCr Transaction Automation and Analytics MDR AND DAC6 	<ul style="list-style-type: none"> TP Documentation Management Solutions provides TP documentation solutions for process automation, document creation, workflow monitoring, document review and approvals. Also assists in CbCR filing, operational TP, benchmarking, and drafting intercompany agreements.
23	Thomson Reuters ONESOURCE	Transfer Pricing Documenter	<ul style="list-style-type: none"> TP Documentation 	<ul style="list-style-type: none"> Automates the TP compliance process by compiling data and preparing reports. Provides comprehensive regulatory TP information around the world.
24	Thomson Reuters ONESOURCE	Benchmark (Add-on)	<ul style="list-style-type: none"> Benchmarking 	<ul style="list-style-type: none"> Provides an automated solution to perform benchmark analyses for various intercompany transactions using industry standard data sources. Features Comparable Search Statistics tool that allows insights on what comparables are most frequently used by other ONESOURCE Transfer Pricing users.

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25	Thomson Reuters ONESOURCE	Operational Transfer Pricing	<ul style="list-style-type: none"> Transaction Automation and Analytics 	<ul style="list-style-type: none"> Computes intercompany fees, retroactive adjustments, and tangible price updates in order to hit policy targets by year end. Creates fully configurable reports. Tracks specific record changes over time with audit trails and traces final allocations back to source data.
26	Thomson Reuters ONESOURCE	BEPS Action Manager	<ul style="list-style-type: none"> CbCr 	<ul style="list-style-type: none"> Provides global BEPS research, local rules, timings, CBC, Master file and Local File requirements. Prepares parent CbC filing in home country, supports secondary filings of CbC in countries where the tax authority does not have Competent Authority Agreements (CAAs) for sharing, and assists with public CbCR for inclusion in ESG reports to meet public CbC reporting obligations in the EU.
27	Thomson Reuters ONESOURCE	DAC6 & MDR Reporter	<ul style="list-style-type: none"> MDR AND DAC6 	<ul style="list-style-type: none"> Provides library containing all the DAC6 and MDR requirements for each country, including rules on identifying reportable arrangements. Applies comprehensive logic based on each country's rules to automatically flag arrangements and transactions. Auto-populates editable versions of the DAC6 and MDR reporting forms with the relevant data collected.
28	Workiva	Transfer Pricing	<ul style="list-style-type: none"> TP Documentation CbCr Intercompany agreements MDR AND DAC6 	<ul style="list-style-type: none"> Assists with calculations, CbCR, documentation, intercompany agreements management, and DAC6 Reporting. Centralizes TP data, calculations, master file, and local files.