

CASE STUDY

Providing Global Transfer Pricing Solutions for a Semiconductor Manufacturing Giant

MGO navigates stringent OECD guidelines to foster client confidence and deliver an industry advantage.

Background

In the highly competitive semiconductor manufacturing sector, a global leader with annual revenues exceeding \$400 million teamed with MGO for an exhaustive global transfer pricing (TP) study. Our task extended beyond the U.S., covering Asia Pacific (APAC) and Europe, Middle East, and Africa (EMEA) countries, thus providing a comprehensive TP analysis that aligns with both domestic and international standards.

Approach

At MGO, we pride ourselves on a bespoke approach to client engagement. We delve deep into understanding our clients' unique business landscapes, enabling us to manage quality control proactively throughout the project lifecycle. For this semiconductor client, our team crafted a master file that exemplified our commitment to excellence, surpassing OECD's stringent requirements. The result was a rich, descriptive narrative of the client's global operations, devoid of numerical data but full of insights that present the company's practices in the best possible light.

Opportunity

The creation of a global TP study — including master file, local file, and country-by-country-reports — essential under Organization for Economic Co-operation and Development (OECD) guidelines, was pivotal for our client. This document is not merely a formality but a strategic tool that outlines a company's business operations, supply chain, and global transfer pricing policies. Given the global scrutiny of TP studies, our client required a firm not only to meet the standard but to advocate on their behalf, ensuring the study contained the substantial and relevant information necessary to withstand regulatory examination and protect against penalties.

Value to Client

The ability to provide comprehensive global transfer pricing services traditionally expected from larger firms is a distinctive advantage. This approach effectively combines personalized service with global knowledge and experience. The continuation of our collaboration in a second year and the establishment of a two-year commitment underscores the client's confidence in receiving high-quality deliverables.

Your Trusted Global Transfer Pricing Provider:

MGO is here to help you navigate the complexities of international transfer pricing. Our track record across industries demonstrates our ability to tailor our solutions to meet your needs — helping you maintain compliance and get more from your global tax strategy. **Leverage our experience for your advantage.**