BLICK ROTHENBERG
a part of AZETS



Transfer Pricing

Aligning tax strategy with business goals

Transfer Pricing needs to be considered when there are transfers of goods, services, intangible property and financing between related parties within a multinational group.

With the introduction of the 2023 Transfer Pricing Records Regulations, GfC7, and the ICTS, transfer pricing is currently a hot topic in the UK with rules continuously evolving. This makes it more challenging to stay up to date alongside the ongoing shifts in the macroeconomic environment that can impact business supply chains and intercompany transactions. As a result, it is crucial to ensure that your transfer pricing methodologies accurately reflect the current business landscape and regulations.

About Blick Rothenberg

Established in 1945 and now a part of AZETS, Blick Rothenberg is a leading UK tax, accounting and business advisory firm.

Unlike many of its peers, Blick Rothenberg is based in a single office in Central London, with over 80 partners and 800 staff, giving us a depth of experience and specialism more akin to much larger firms. These include areas such as Transaction Services, Transfer Pricing, R&D, VAT, Global Mobility and management incentive schemes, together with a focus on international inbound investors via local language inbound country desks.

TP Policy Planning

Global TP Design

Designing appropriate policies to price cross-border intercompany transactions.

Business Restructuring

Updating TP policies for any business changes (e.g. international expansion, supply chain changes).

M&A Support

Pre-deal

Performing TP risk reviews during the due diligence process; intercompany financing planning.

Post-deal

Aligning TP policies with commercial changes in the business post-acquisition (e.g., integrating business lines).

TP Compliance

Documentation

Preparing TP reports (Master File, Local File, TP forms, Country-by-Country reports), benchmarking and economic analyses.

Implementation

Reviewing TP policies have been implemented appropriately in financial statements / tax returns.

Controversy

Dispute Resolution

Assisting with enquiries from tax authorities; applying for Mutual Agreement Procedure claims.

Advanced Pricing Agreements

Negotiating agreements with tax authorities to obtain certainty in pricing for complex transactions.



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Transfer Pricing – Our Service Lead

Suzie is a Transfer Pricing Economist with extensive expertise in guiding multinational clients through the complexities of transfer pricing. Suzie's experience spans strategic planning for business transformations, international expansion, IPOs, M&A, global compliance, and audit support.

Suzie also specialises in financial transactions transfer pricing, which includes analysing intercompany loan interest rate pricing, debt capacity analysis, guarantee fees, and intermediary financing margins.

In 2025, Suzie joined Blick Rothenberg to lead their transfer pricing team, following roles at PwC in both London and New York, and Alvarez & Marsal UK. Suzie's international experience and wide-ranging client portfolio enables her to apply a truly global lens and provide bespoke solutions tailored to each client's unique needs.

There have been many developments in UK transfer pricing in recent years, including new guidance released in September 2024 and draft legislation in April 2025, highlighting HMRC's focus in this area. Blick Rothenberg's team of transfer pricing experts are on hand to guide you through these changes.

> *"The transfer pricing landscape is continuously evolving, as well as clients' businesses. Staying on top of those changes and supporting my clients accordingly helps to make their lives a lot easier. It's why I love doing what I do."*



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