

GTP® MALL Product Information Sheet

Digital Solutions for Transfer Pricing Management

Product ID: GTP_MANAG_050

Product Name: GTP® Contract TNMM



Inside the GTP® MALL, this product is positioned at:

Rack: Contract Templates

3rd Floor: GTP® MANAGER Solutions

The product represents:

Managing Transfer Pricing

About the Product:

.docx-template to draft the product supply agreement between two related parties (Transactional Net Margin Model / Target Margin Model))

What the product contains:

This template is a draft contract construed on the idea of the so-called "target margin model" for product or service transactions using the TNMM system as the OECD arm's length approach. The TNMM arm's length model deems one transaction partner the "routine unit". The template provides for the relevant text bodies to implement such related-party contract into the transfer pricing system. The template needs to be customized to the specific related-party transactions. For that, you may wish to use GTP® Expert Services (e.g. GTP_EXP_010 or similar articles) and articles from the area of GTP® Benchmarking Services. The template may not suffice for legal and/or tax requirements in the jurisdictions applied and you are recommended to bring the draft contract forward for review to your legal counsel and/or tax consultant.

Options:

Reseller, Sales Agent, Contract Manufacturer, Service Provider, Other Task

Deliverable:

.docx-template, specified to functional type selected

Delivery time:

Delivery time: up to 3 workdays

Keywords:

Contract, structure, price setting,

Recommended GTP® Products: -

Other GTP® Products: -

About the GTP® MALL | the Online-Shop of GlobalTransferPricing.com

Referring to www.shop.GlobalTransferPricing.com, the transfer pricing practitioner now finds plenty of components on which the transfer pricing system of a multinational group is established. Shop articles of the GTP® MALL are ready-made for download and/or digital order, such as:

- **Benchmarks** like profitability ratios, license ratios, interest ratios, price data
- **Transfer pricing expertise** in various shapes like training features, documents, instructions
- **Templates** on documentation and routine transfer pricing work
- **Tools** on operative price setting issues between related parties
- **System components** for transfer pricing management and organization

The areas of the *Cafeteria*, the *Terrace*, and the *Basement* will be open soon.

Dr. Markus Brem, the founder and managing partner of the GTP® TEAM about the online shop:

„Since its foundation 15 years back, the GTP® TEAM has pursued its business model of standardization, simplification, and digitalization on transfer pricing features. Now, with the GTP® MALL in place, multinational groups and international tax experts can benefit from cost-efficient and straight-lined solutions and articles on structuring, price setting, arm’s length assessment, income allocation, documentation, and controversy. With such components, the practitioner may realize its own expertise on the specific case of the transfer pricing system of the multinational group.“

It is the aim of the GTP® TEAM that the content of the GTP® MALL and the underlying model of professional expertise can shift transfer pricing practice to more consistency, efficiency, and reliability of income allocation and documentation. In light of the OECD [BEPS](#) Project, an increase in consistency and methodological spirit is needed more than ever with regard to price setting, arm’s length analysis, and documentation, tax audits, and MAP procedures. Only with such logic, the GTP® TEAM believes experts can master the internal workload of administration, while offsetting on tax risk behind transfer pricing and safeguarding the fair share of tax revenues into tax jurisdictions.

About the GTP® TEAM

The GTP® TEAM provides transfer pricing and compliance management solutions. Customers are large and mid-sized multinationals as well as international tax consultants and governmental and other organizations. The company stands for practitioner solutions on transfer pricing to ease this part of globalization and cross-border business. Structuring transfer pricing systems, various kinds of arm’s length tests, benchmarking, and compliance solutions are products and services of the GTP® TEAM.

The GTP’s model is construed on standardization, simplification, and digitalization. Structuring transfer pricing systems of multinational groups, arm’s length assessment models, documentation, and controversy solutions belong to GTP’s expertise, in particular with regard to mid-sized groups. The founder and director, Dr. Markus Brem, has been working on transfer pricing for the past two decades domestically and abroad, both in the academia and serving as professional consultant.