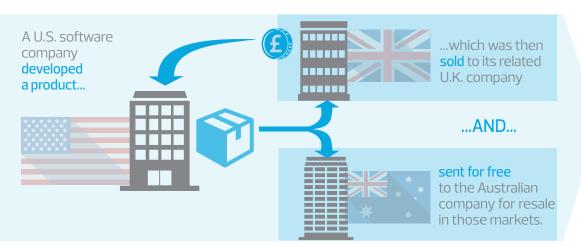
Global connectivity helps software company save millions via transfer pricing study



The result:

Huge losses

in the U.S., with little offsetting revenue and significant sales revenue (and therefore tax exposure) in the U.K. and Australia with few offsetting expenses



Transfer pricing specialists from all **three RSM firms** worked together seamlessly to **examine local market conditions** and **normal industry practices**, thereby determining appropriate arm's length pricing for sales of the product from the U.S. company to its U.K. and Australian operations.

RSM UK RSM Austrailia

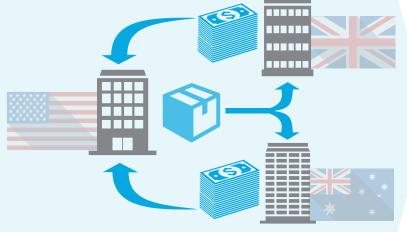
Client

\$£

\$£

RSM US LLP

The U.S. company significantly increased the price charged to the U.K. operation and set an appropriate price for sales to the Australian operation.



The result:

Both the U.K. and Australian operations saw a **significant drop in taxes**, as the purchase prices they were now paying were arm's length. The U.S. company was able to **repatriate some of its income**, building the value of the U.S. operation, but with little



impact on the U.S. tax picture, as the losses in the U.S. offset the repatriated income.

+1800 274 3978 www.rsmus.com

This document contains general information, may be based on authorities that are subject to change, and is not a substitute for professional advice or services. This document does not constitute audit, tax, consulting, business, financial, investment, legal or other professional advice, and you should consult a qualified professional advise before taking any action based on the information herein. RSM US LIP, its affiliates and related entities are not responsible for any loss resulting from or relating to reliance on this document by any person. Internal Revenue Service rules require us to inform you that this communication may be deemed a solicitation to provide tax services. This communication is being sent to individuals who have subscribed to receive it or who we believe would have an interest in the topics discussed. RSM US LIP is a limited liability partnership and the U.S. member firm of RSM International, a global network of independent audit, tax and consulting firms. The member firms of RSM International collaborate to provide services to global clients, but are separate and distinct legal entities that cannot obligate each other. Each member firm is responsible only for its own acts and omissions, and not those of any other party. Visit rsmus.com/aboutus for more information regarding RSM US LLP and RSM International. RSM® and the RSM logo are registered trademarks of RSM International Association. The power of being understood® is a registered trademark of RSM US LLP.

