Dawgen GLOBAL

2026 EDITION



Dawgen Global illustration

SERVICE BROCHURE · TAX ADVISORY

Transfer Pricing & Pillar Two

Defensible prices between related parties.

Transfer pricing documentation, policy design and global minimum tax readiness for groups operating in and through the Caribbean.

PRICE AT ARM'S LENGTH. DOCUMENT IT. DEFEND IT.

01 · THE BUSINESS ISSUE

Related-party transactions are under the spotlight.

Tax authorities across the region are giving more attention to how groups price goods, services, loans and intellectual property between related companies. At the same time, the global minimum tax is changing how large groups are taxed.

Rules are spreading

Several Caribbean territories now have transfer pricing rules, documentation requirements or related-party disclosures, and others are following.

Audits are more detailed

Tax authorities increasingly ask for evidence that intercompany charges reflect arm's-length terms, backed by analysis and agreements.

Global minimum tax

The OECD Pillar Two rules set a 15% minimum effective tax rate for groups with annual revenue of €750 million or more, affecting how incentives and low-tax structures work.

Lenders and investors ask

Development finance institutions, lenders and auditors may request transfer pricing studies or certificates as part of their reviews.

COMMON INTERCOMPANY ARRANGEMENTS WE REVIEW

- Management and head-office service fees
- Intercompany loans and guarantees
- Purchase and resale of goods within a group
- Royalties for brands and intellectual property
- Cost-sharing and shared services
- Transactions with low-tax or exempt entities

> **Good transfer pricing is not about avoiding tax. It is about pricing intercompany transactions fairly and being able to prove it.**

02 · OUR SERVICES

Transfer pricing from policy to defence.

We help groups set intercompany prices, document them to the standard tax authorities expect, and respond when they are questioned.

Transfer pricing documentation

Studies that meet local and OECD standards.

- Local file and master file
- Functional and risk analysis
- Benchmarking studies

Policy design

Intercompany pricing set up correctly from the start.

- Transfer pricing policies
- Intercompany agreements
- Management fee and loan pricing

Risk reviews

Where your exposures are, before an audit finds them.

- Transfer pricing health checks
- Related-party disclosure reviews
- Remediation plans

Pillar Two readiness

Understanding the global minimum tax.

- Scoping and impact assessments
- Effective tax rate modelling
- Incentive and structure reviews

Audit defence

Support when an authority asks questions.

- Responses to information requests
- Support during tax audits
- Objections and dispute support

WHO WE WORK WITH

Multinational groups with Caribbean subsidiaries · regional groups operating in several territories · energy and infrastructure projects · manufacturing and distribution groups · financial services groups · companies with foreign shareholders and lenders.

Broader tax compliance and advisory are covered in our **Tax Advisory** brochure.

03 · OUR APPROACH

Built on facts, benchmarked and documented.

Our transfer pricing work follows the OECD Transfer Pricing Guidelines and the local rules in each territory. We focus on the transactions that carry the most value and risk.

01

Map the transactions

We identify every material related-party transaction, the entities involved and the amounts.

02

Analyse functions and risks

Interviews and document review show which entity does what, owns what and bears which risks.

03

Select the method

We choose the most appropriate transfer pricing method for each transaction type.

04

Benchmark

We compare your pricing with independent companies or transactions using recognised databases and data sources.

05

Document and maintain

We prepare the documentation, agreements and policy, and update them as the business changes.

PROCESS-DRIVEN

Scope is agreed before work begins, so the study covers what matters and fees reflect agreed deliverables.

STANDARDS WE APPLY

- OECD Transfer Pricing Guidelines
- Local transfer pricing rules
- Pillar Two model rules
- Recognised benchmarking practice

CONNECTED EXPERTISE

Our audit, valuation and legal colleagues support intercompany agreements and certificates.

04 · TRANSFER PRICING DOCUMENTATION

Documentation that stands up to review.

A transfer pricing study is your first line of defence. It explains your group, your intercompany transactions and why the prices are arm's length.

Master file

An overview of the group, its business and its transfer pricing policies.

Local file

Detailed analysis of the local entity's related-party transactions.

Benchmarking

Comparable data showing your pricing sits within an arm's-length range.

A TYPICAL STUDY

01

Data request

Financials, agreements and organisation charts collected.

02

Interviews

Functions, assets and risks confirmed with management.

03

Analysis

Method selected and benchmarking performed.

04

Report

Study finalised and kept ready for any request.

WHEN YOU NEED A STUDY

- Before filing deadlines where required
- When an authority requests one
- When lenders or investors ask
- When intercompany terms change

KEEP IT CURRENT

Benchmarks and documentation should be refreshed regularly. We offer annual updates.

Know how the global minimum tax affects your group.

Groups with annual revenue of €750 million or more face a minimum 15% effective tax rate in each jurisdiction where they operate. Several Caribbean territories have responded with new taxes or changes to incentives.

Impact assessment

Where the group may face top-up tax.

- Scoping of entities and jurisdictions
- Jurisdictional effective tax rate estimates
- Effect of local incentives and exemptions
- Data gaps and reporting needs

Planning and readiness

Preparing for compliance and decisions.

- Structure and incentive review
- Data and reporting process design
- Safe harbour assessment
- Board briefing on the impact

WHY IT MATTERS FOR THE CARIBBEAN

Incentives change

Tax holidays and low rates may no longer reduce a large group's total tax.

New local taxes

Some territories have introduced domestic minimum taxes to collect top-up tax locally.

More data

Groups need new data from each entity to calculate effective tax rates.

> **Even groups below the Pillar Two threshold should watch how their territories respond. Incentive regimes are being reconsidered across the region.**

06 · WHO SHOULD CONSIDER THIS SERVICE

For groups with cross-border related-party transactions.

Multinational groups with Caribbean subsidiaries or branches

Regional groups trading between companies in several territories

Energy and infrastructure projects with shareholder loans and service fees

Companies with foreign lenders needing transfer pricing evidence

Groups in scope of Pillar Two assessing global minimum tax impact

Companies under tax audit facing transfer pricing questions

07 · ILLUSTRATION

An energy project and its lenders' request

Situation. A Caribbean energy company paid management fees and interest to related companies overseas. Its lenders and auditors asked for evidence that these charges were at arm's length.

Our work. We mapped the intercompany transactions, carried out a functional analysis and benchmarking study, and prepared a transfer pricing study with updated intercompany agreements.

Outcome. The study was accepted by the lenders and auditors, and the company now has documentation ready for any tax authority request, with an annual update scheduled.

Anonymised composite illustration based on regional experience.

WHAT YOU RECEIVE

- Transaction map and scoping memo
- Functional and risk analysis
- Benchmarking study
- Transfer pricing report
- Intercompany agreements and policy
- Pillar Two impact summary

08 · ENGAGEMENT OPTIONS

Choose the support you need.

Transfer pricing study

Local file, master file and benchmarking.

Policy and agreements

Intercompany pricing policy and agreements.

Health check

Review of related-party exposures and disclosures.

Pillar Two assessment

Scoping, effective tax rate estimates and readiness.

Fees are tailored to each organisation and agreed in the engagement letter once scope and deliverables are confirmed.

WHY DAWGEN GLOBAL

- **Caribbean insight.** Over 24 years serving Caribbean business.
- **One desk, 35 territories.** Centrally managed from our Caribbean headquarters.
- **Integrated expertise.** Audit, tax, technology, HR and legal specialists on call.
- **We own the work.** We complete it, then train your team.

09 · START HERE

- Request a transfer pricing proposal
- Book a Pillar Two impact conversation
- Ask about a transfer pricing health check

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