

## Thinking big can help keep your tax controversy small.

Today's global connectivity means it is easier for companies to be faced with multi-dimensional, multi-country tax controversy. How can you manage the risk?



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### Upsurge of transfer pricing controversy seen in emerging countries

Tax administrators in emerging countries continue their efforts to prevent perceived base erosion, resulting in increased transfer pricing audits and controversy in these countries. In some Asian and Latin American countries, for example, tax authorities have been assertive in questioning what they perceive as “abusive” intercompany financing, in addition to challenging commodities transfer pricing and the substance of principal companies along the supply chain. In today’s environment, it is more critical than ever for multinational companies to have a robust transfer pricing strategy in place.

Read more about best practices to manage these risks in EY’s latest [Transfer Pricing survey](#) and an [EY Global Tax Alert](#) on BEPS 2.0.

#### Related articles:

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