



AB Advisory Group

---

# TRANSFER PRICING SERVICES GLOBAL CHANNEL

2026

# CA ABHISHEK BHAVSAR

Abhishek is a qualified Chartered Accountant (CA) from The Institute of Chartered Accountants of India (ICAI).

Abhishek's 10+ years of rich consulting experience includes providing advisory, compliance and litigation assistance to multinational clients in following core domains:

- **Inbound & Outbound Structuring Advisory** [*Promoter's Holding Level Strategy as also Structuring at Operating Level*]
- **Cross-Border Transactions –** [*International Taxation Matters & India Forex Regulations*]
- **Transfer Pricing** [*India & Overseas*]
- **Strategic Deals – Buy Side & Sell Side Support** [*Due-Diligence, Valuation, Negotiation Assistance, Structuring Advisory, Drafting Term Sheets*]



## FIRMS WITH WHOM ABHISHEK WORKED



**Senior Manager - Audit & Tax**  
Udyen Jain Associates, Pune  
December-2013 to March-2015



**Executive - Transfer Pricing**  
SKP Consulting, Pune  
June-2015 to April-2016



**Sr. Consultant - Transfer Pricing**  
Ernst & Young, Bengaluru  
May-2016 to January-2019



**Sr. Manager - Tax & Regulatory**  
KP Shah Associates, Ahmedabad  
September-2019 to October-2022



**Founder**  
AB Advisory Group, Ahmedabad  
Since October-2022

## SPEAKER @ ICAI BRANCHES

August 2023  
ICAI Anand Branch,  
Gujarat



May 2023  
ICAI Surat Branch,  
Gujarat



## CONTENT CREATION JOURNEY

Abhishek is the creator of '**Mastering the Art of Transfer Pricing in 9 Days**,' a skill-based course focused on the Indian Transfer Pricing Market. Also, Abhishek manages his YouTube Channel (**@theLearningCA**), providing informative content for tax and finance professionals.

# Our Rich Credentials

## (Growing Since Jul-23)

| Client Details with HQ Location                                                                                      | Key Transfer Pricing Projects Worked Upon                                                                                                                                                                                                                                                                                                                                                                              |
|----------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| UK based Agritech Start-up                                                                                           | <ul style="list-style-type: none"> <li>Advising on various feasible remuneration models which can be adopted suiting the functional roles of the UK &amp; India entity &amp; assistance in implementation of the same</li> </ul>                                                                                                                                                                                       |
| Listed Company on Indian Exchange – engaged in PCB Manufacturing                                                     | <ul style="list-style-type: none"> <li>Annual TP Compliance Assistance</li> </ul>                                                                                                                                                                                                                                                                                                                                      |
| Indian Lab Grown Diamonds Machine Manufacturer ( <i>One of the globally known diamond group based out of Surat</i> ) | <ul style="list-style-type: none"> <li>Benchmarking of a INR 100 Crores+ specified domestic transactions</li> </ul>                                                                                                                                                                                                                                                                                                    |
| UAE based Family Office                                                                                              | <ul style="list-style-type: none"> <li>Advising on various feasible remuneration models which can be adopted suiting the functional roles of the UAE &amp; India strategic management service entity &amp; assistance in implementation of the same</li> </ul>                                                                                                                                                         |
| Indian subsidiary of a Singapore entity managing a community platform                                                | <ul style="list-style-type: none"> <li>Re-examining of the existing TP arrangement</li> <li>Advising on various feasible remuneration models which can be adopted suiting the functional roles of the entities</li> <li>Assistance in implementation of remuneration model which mainly involves drafting of an inter-company agreement between Group entities &amp; discussing the positions with Auditors</li> </ul> |
| One of the biggest Indian Supplier of Known Chinese Car Manufacturer                                                 | <ul style="list-style-type: none"> <li>Re-examining of the existing TP arrangement &amp; documenting the appropriate functional profiles</li> <li>Undertaking the Annual TP Compliance Assistance</li> </ul>                                                                                                                                                                                                           |
| Indian Subsidiary of Singapore Entity engaged in IT Operations                                                       | <ul style="list-style-type: none"> <li>On-call advisory on inter-company agreement (ICA) aspects on account of liquidation process</li> </ul>                                                                                                                                                                                                                                                                          |
| Indian Subsidiary of Cyprus Based Group engaged in manufacturing of Injection Moulding Machines                      | <ul style="list-style-type: none"> <li>Assisted in undertaking of the Transfer Pricing Positions for the past non-compliant fiscal years</li> <li>Annual TP Compliance Assistance</li> </ul>                                                                                                                                                                                                                           |
| Indian Subsidiary of Thailand based Tyre Manufacturing Group                                                         | <ul style="list-style-type: none"> <li>Assisted in obtaining Clean Order (i.e., without any adjustment) from Indian TP Authorities for the litigation pertaining to the FY 2019-20 [Multiple International Transactions – Total Value of Transactions – more than INR 500 Mn]</li> <li>Annual TP Compliance Assistance</li> </ul>                                                                                      |
| US based IT / ITeS Service Provider                                                                                  | <ul style="list-style-type: none"> <li>Advisory on Inter-company Remuneration Modelling</li> </ul>                                                                                                                                                                                                                                                                                                                     |

**Excludes our Routine India & UAE TP Compliance Engagements**



# STRATEGIC ADVISORY & RISK ASSESSMENT

## OUR QUALITY PROCESS



## OUR KEY SERVICE OFFERINGS

### Inter-company Remuneration Modelling

- Evaluating the intercompany pricing strategy for proposed intra-group transactions ensuring compliance with tax laws, optimizing profits and minimizing future disputes through strategic pricing structures and financial simulations

### Drafting of the Inter-company Agreement (ICA)

- Conducting detailed client discussions and assisting in drafting agreements for legal review.

*(Note: We can assist with drafting the ICA. However, the client shall be responsible for having it vetted by a legal expert/attorney)*

### Global TP Policy, Risk Reviews, Impact Assessments & Tax optimisation

- Evaluate intra-group transactions, supply chain model at group level, & assess compliance of inter-company transactions with arm's length principle
- Consciously evaluating the supply chain wherein tax liabilities can be minimized by strategic pricing which duly aligns with the actual value creation.
- Identify potential risks and impacts

## OUR FEES MODEL

- **Case Discovery Call:** In general, we offer an initial discovery call at no charge, providing an opportunity for broad-level discussions on the facets and objectives your client wishes to address. This call is designed to **establish trust** and demonstrate our expertise, laying the foundation for a **long-term relationship between your Brand & the Client**.
- **Core Advisory Project:** We prefer to charge a flat fee based on the complexity and scope of the advisory required, which is generally payable in two instalments:
  - 70%-75% upfront / advance; and
  - Balance upon sharing of the first cut draft of deliverable
- **ICA drafting:** Fees are payable on similar terms in line with Core Advisory Project. Further the fees shall not cover any payments which are to be made to any legal firm/expert as may be engaged by client.

# TP COMPLIANCE ASSISTANCE

## ANNUAL COMPLIANCES & OUR SCOPE

### A) Assistance in Drafting of Local File & Master File

**Scope of Services:** Rendering an end-to-end support in preparing jurisdiction-specific Local Files and group-level Master Files in accordance with OECD BEPS Action 13 requirements and relevant domestic transfer pricing regulations across multiple jurisdictions. This broadly includes:

- Undertaking of detailed discussions with client to understand roles and responsibilities of parties within the product/service value chain as also organizational structure, ownership linkages, and global value chain
- Conduct a comprehensive analysis to apply suitable Transfer Pricing methods, identify internal and external comparables, make necessary adjustments, and interpret data for compliance assessment in evaluating arm's length transactions.
- Preparation of industry and economic analysis to establish commercial context.
- Compilation of financial information, segmented profitability analysis.
- Coordination with global stakeholders to ensure consistency between Master File and Local File narratives.
- Alignment with country-specific compliance requirements, thresholds, and filing deadlines.
- Assist in drafting of disclosure / reporting form/schedule in the prescribed format.

#### Optional Advisory Areas

- Comprehensive intercompany transaction mapping, including assessing the TP applicability on transaction as also financial flows and contractual arrangements.

#### Exclusions from above scope

- Certifications to or representations before the tax authorities

**B) Assistance in Drafting of TP Study Report:** Preferable for jurisdictions where Local File compliance is not mandatory, but taxpayers are required to demonstrate arm's length pricing through appropriate transfer pricing analysis and supporting documentation

**Scope of Services:** Drafting of robust transfer pricing study reports to demonstrate that controlled transactions comply with the arm's length principle under applicable regulations. This broadly includes:

- Identification and characterization of controlled transactions across goods, services, intangibles, and financing arrangements.
- Selection and justification of the most appropriate transfer pricing method in accordance with OECD Guidelines and local rules.
- Preparation of functional interviews and operational questionnaires with client personnel.
- Development and documentation of transfer pricing policies aligned with business models.
- Financial analysis including profitability testing, margin computation, and variance analysis.
- Preparation of defense-ready reports suitable for submission to tax authorities.
- Advisory on pricing adjustments, year-end true-ups, and policy implementation.

#### Exclusions from above scope

- Certifications to or representations before the tax authorities

### C) Conducting Benchmarking Using External Databases & Economic Analysis:

**Scope of Services:** Drafting of memo covering the economic analysis which includes:

- Identification of potential comparable companies or transactions using recognized external databases (such as TP Catalyst-Orbis, ICAI Capitaline (for India), RoyaltyStat, LoanConnector, etc., as applicable).
- Application of quantitative and qualitative screening criteria to refine the comparable set in accordance with OECD Guidelines and jurisdictional regulations.
- Computation of arm's length ranges, including statistical analysis such as interquartile ranges and multi-year averaging where appropriate.
- Preparation of economic analysis reports summarizing the search strategy, screening process, comparable set, and results.
- Provision of benchmarking results for use in client-prepared documentation, compliance filings, or internal policy setting.
- Assistance with benchmark refresh or update studies for subsequent years.

#### Exclusions from above scope

- Certifications to or representations before the tax authorities
- Preparation of TP Study reports or Local File or Master File



# BENCHMARKING ON EXTERNAL DATABASES

| GLOBAL DATABASE                                                                 | MOSTLY USED                                                                                                                                                                     | OUR FEES (IN USD)                    |
|---------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| <b>Orbis Database (TP Catalyst)</b>                                             | <ul style="list-style-type: none"><li>• Testing of profitability margins (at gross or net level) for comparable companies</li><li>• Preferable for Non-Indian Clients</li></ul> | Starts from USD 900 per benchmarking |
| <b>RoyaltyStat Database</b>                                                     | <ul style="list-style-type: none"><li>• Royalty / License Fee Transactions</li></ul>                                                                                            |                                      |
| <b>Loan Connector Database</b><br>+<br><b>SNP Credit Rating tool (Riskcalc)</b> | <ul style="list-style-type: none"><li>• Interest rate benchmarks</li><li>• High Value Debt - More than USD 100,000 loan value</li></ul>                                         |                                      |

## PAYMENT TERMS

- 100% of project to be charged in advance before initiating analysis
- In addition to the fees set out above all direct expenses (such as travelling meals, legal fees if paid any, and other expenses specifically related to this engagement and disbursements ("Out of Pocket expenses" or "OPE") incurred in connection with the performance of the services and taxes will be charged at costs as appropriate.

## DELIVERY TIMELINES

- 9-11 Working Days from the date of receipt of advance fees

## KEY EXCLUSIONS

- Undertaking of Detailed Functional Analysis
- Assisting in any Compliances, issuance of certificates or making representations before any Govt. Authorities
- Providing of Core Advisory pertaining to specific transaction(s)



**AB ADVISORY  
GROUP**

**INDIA GCC OFFICE**

407, Nobles Trade Centre,  
Memnagar, Ahmedabad, Gujarat, India

[abhiishhek@abadvisorygroup.in](mailto:abhiishhek@abadvisorygroup.in)

+91-9049-00-8778