

[Date]

[Client Name]

[Client Address]

[City, State, Zip Code]

Subject: Engagement Letter for Transfer Pricing Documentation Services

Dear [Client Contact Name],

This letter confirms the engagement of [Firm Name] ("the Firm") by [Client Name] ("the Client") to provide transfer pricing documentation services for the fiscal year ending [Date].

1. Scope of Services

The Firm will assist the Client in preparing transfer pricing documentation to satisfy the requirements of [Specify Jurisdiction/Internal Revenue Code Section, e.g., Section 482 or OECD Guidelines]. Our services include:

- Conducting a functional analysis of the relevant entities.
- Economic benchmarking and search for comparable transactions or companies.
- Preparation of a local file and/or master file as required by local regulations.
- Review of intercompany agreements related to the covered transactions.

2. Client Responsibilities

The Client agrees to provide all necessary financial data, organizational charts, and descriptions of intercompany transactions in a timely manner. The accuracy and completeness of the information provided are the responsibility of the Client.

3. Fees and Billing

Our professional fees for this engagement are estimated to be [Amount/Range]. This estimate excludes out-of-pocket expenses which will be billed at cost. Invoices will be issued [Monthly/Upon Completion] and are payable within [Number] days of receipt.

4. Limitation of Liability

The documentation prepared is intended solely for the use of the Client for tax compliance purposes. The Firm does not guarantee that the tax authorities will accept the transfer pricing positions taken in the documentation.

5. Confidentiality

The Firm will maintain the confidentiality of all proprietary information provided by the Client during the course of this engagement, subject to legal or regulatory requirements.

6. Governing Law

This agreement shall be governed by and construed in accordance with the laws of [Jurisdiction].

Please sign and return a copy of this letter to indicate your acceptance of these terms.

Sincerely,

[Partner Name]

[Firm Name]

Accepted and Agreed:

For [Client Name]: _____

Name and Title: _____

Date: _____