

[Date]

[Client Contact Name]
[Client Company Name]
[Client Address]
[City, State, Zip Code]

Re: Transfer Pricing Documentation Engagement

Dear [Contact Name],

This letter confirms our engagement to assist [Client Company Name] (the "Company") in the preparation of transfer pricing documentation for the fiscal year ending [Date].

1. Scope of Services

We will provide the following services:

- Review of the Company's intercompany transactions and organizational structure.
- Performance of a functional analysis to identify key activities, risks, and assets.
- Selection of the most appropriate transfer pricing method(s).
- Economic analysis and benchmarking studies using industry databases.
- Preparation of a [Local File / Master File] consistent with [OECD Guidelines / Local Tax Law].

2. Client Responsibilities

The Company is responsible for providing timely and accurate financial data, executed intercompany agreements, and access to personnel for interviews. The Company maintains final responsibility for the positions taken in the documentation and for filing with tax authorities.

3. Fees and Billing

Our fee for this engagement is estimated at [Amount], plus applicable taxes and out-of-pocket expenses. We will bill [Monthly / Upon Completion]. Invoices are payable within [Number] days of receipt.

4. Confidentiality

Both parties agree to treat all proprietary information and data exchanged during this engagement as strictly confidential, except as required by law or tax authorities.

5. Limitation of Liability

Our liability for any claim related to this engagement shall be limited to the total fees paid by the Company for these services.

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

Sincerely,

[Your Name/Partner Name]

[Firm Name]

Acknowledgment and Acceptance:

[Client Authorized Signatory]

Date: _____