



BUREAU VAN DIJK

A Moody's Analytics Company



tp
catalyst

**Streamlining transfer pricing
analysis**

**Welcome to the
business of certainty**

The software and data platform that streamlines transfer pricing processes

TP Catalyst is a data and process driven tax analysis tool.

It simplifies transfer pricing analyses, including profit and transaction-based analyses. Developed in conjunction with TP specialists, TP Catalyst streamlines processes, eliminates redundant steps and reduces data manipulation.

Using TP Catalyst, you can identify comparables, derive arm's-length benchmarks, apply adjustments and produce documentation.

You can also do arm's-length analyses for tangible and intangible intra-group transactions, intra-group services and intra-group financing.

Who is TP Catalyst for?

Transfer pricing professionals and economists rely on our products for arm's-length analysis and compliance. TP Catalyst is used by:

- top tax advisory firms, including the Big 4
- tax departments of multinational enterprises (MNEs)
- tax administrations from countries with TP requirements

How can TP Catalyst benefit me?

TP Catalyst helps you:

- streamline your processes and save you time
- have greater control over TP compliance
- be more cost efficient in your TP risk management
- develop TP expertise within your organization
- complete various types of analysis

Reliability

The data available on TP Catalyst also offers you reliability for arm's-length analysis. Take advantage of:

- our extensive corporate ownership data
- our global coverage of companies around the globe, with detailed financials
- 70,000 royalty rates
- 9,000 third-party loan tranches
- 4.5 million commodities prices

Comparability

We are the resource for private company data.

TP Catalyst gives you robust information to assess comparability for arm's-length analysis, including:

- original scanned documents
- detailed overviews
- intellectual property profiles
- financial stability indicators
- M&A activity summaries
- transactional data

A comprehensive transfer pricing solution

We offer the most comprehensive solution for TP risk management and source of external third-party data for TP risk assessment and analysis.

Corporate tax departments and transfer pricing consultancies

Planning

- set up your future intra-group pricing policies
- quantify tax benefits under different operating structures
- do valuations for restructuring and M&A integrations

Audit

- do due diligence research on arm's-length transaction terms and conditions and quantify the potential tax risk of specific transactions or group picture
- quantify tax provisions during audits
- discuss and negotiate with advisors and tax authorities

Compliance and risk management

- centralize your TP compliance management
- increase the collaboration across your organization
- increase the value from your external advisors
- make sure there is consistency in your global TP documentation
- automate the maintenance of your TP documentation processes
- do risk assessments, based on CBCR data and operating results data
- estimate potential TP adjustments

Tax authorities

Comprehensive company data

Ideal for:

- international tax and compliance risk assessment
- TP risk assessment
- resale price and cost-plus method analysis
- CPM/TNMM and residual profit split analysis
- debt capacity and thin capitalization analysis

Licence/service agreement data

Ideal for:

- due diligence research on arm's-length transaction terms and conditions
- research on intangible property life cycles
- CUT/CUP analysis on IP transfers
- CUT/CUP analysis on intra-group services

Loan agreement data

Ideal for:

- due diligence research on arm's-length transaction terms and conditions
- debt-capacity analysis
- CUT/CUP analysis on senior intra-group finance
- CUT/CUP analysis on intra-group guarantees
- CUT/CUP analysis on cash-pooling arrangements

| How does TP Catalyst work?

TP Catalyst is a web-based database for arm's-length benchmarking analysis.

It draws on company data, royalty rate data, lending margin data and commodity price data for CPM/TNMM, resale price/cost-plus method, or CUT/CUP Method analysis.

The final output is either an Excel file with the benchmarking analysis data, or a Word or PDF document that describes the full benchmarking process. This includes the arm's-length data, rejection matrices, economic adjustments and the details of all selected comparables.

The software and data platform that streamlines transfer pricing processes

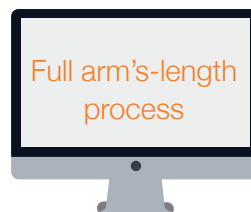
Comprehensive data for transfer pricing

Orbis company data
+
Royalty rate data | Lending margin data | Commodity price data

TP Catalyst identifies comparables and constructs profitability, royalty rate and lending margin benchmarks

Select data set > Apply criteria > View results > Comparability analysis > Benchmark analysis

You can export the arm's-length analysis of the data



The provider-of-choice of company information for profit-based analyses



Powering TP Catalyst

Orbis is the world's most powerful comparable data resource on private companies. It is the resource for company data.

Orbis powers TP Catalyst. The company reports are detailed and comparable, and comprise:

- 26 balance sheet items
- 26 profit and loss account items
- 32 standard ratios

Orbis also provides you with access to:

- extensive ownership structures, for accurate selection of arm's-length analysis
- detailed business overviews, with cross-referenced industry codes and access to company websites, for comparability
- information on intellectual property, financial strength and M&A profiles, for comparability
- original documents including filed annual accounts, license agreements, credit facilities and commodity contracts

We also offer a range of regional databases that provide the same standardized formats as Orbis: Orbis Europe, Orbis Americas and Orbis Asia Pacific. These supersede the well-known Amadeus and Oriana solutions.



Streamlining transfer pricing compliance

TP Catalyst Document Manager promotes a collaborative approach to the TP documentation process across your organization. It centralizes all relevant information and streamlines your project management of the TP documentation process and output.

With Document Manager, you can upload your functional analyses, legal entity overviews, industry analyses and benchmarks, then pick your countries and instantly create your choice of documents, including:

- master file
- local files
- CBC reports

You can upload all relevant legal entities across a group, and access internal financial data for TP risk assessment and preparation for CBCR output.

You can also set up users and control the access level they have.

Additional expertise from our data partners

In addition to the comprehensive company data from Orbis, TP Catalyst includes data from partners with specific expertise.

Royalty rate module, powered by ktMINE

- 70,000 royalty rates
- 20,000 licence and service agreements
- service fees and commission rates
- structured and searchable terms and conditions
- access to full underlying agreements

TP Catalyst offers:

- current and historical licence and service agreement data for TP analytics
- access to the licence/service agreement data in a powerful search and analysis interface for a variety of analytical purposes

Applications:

- due diligence and research
- research on intangible property
- arm's-length analysis (CUT/CUP) on intangible property transfers
- arm's-length analysis (CUT/CUP) on intra-group services

Loans database, powered by CUFTanalytics

- over 15,000 lending margins and interest rates
- third-party senior credit facilities
- structured and searchable terms and conditions
- access to full underlying agreements

TP Catalyst offers:

- access to current and historical senior loan agreement data for lending margin analysis

Applications:

- due diligence and research
- debt capacity analysis
- arm's-length analysis (CUT/CUP) on intra-group loans, cash pooling arrangements and intra-group fees

Enhanced lending margin module, powered by Moody's Analytics RiskCalc™

The Enhanced Loans Module combines data from CUFTanalytics with credit risk data from our award-winning RiskCalc™ solution to:

- objectively assess the creditworthiness of the target borrower using our quantitative, forward-looking probability of default measure, known as Moody's Analytics Probability of Default (PD), and implied rating
- screen the CUFTanalytics Loans database for similar companies using PD and implied ratings
- apply comparability adjustments to the comparable loans based on expected loss
- produce an adjusted benchmark of arm's-length returns on risk

Commodities module, powered by TPRD

- 380 commodity prices, updated daily
- 100 types of commodity agreements
- 20 commodity exchange markets
- 8.5 million daily commodity prices going back to 2013
- structured and searchable terms and conditions
- access to underlying commodity contracts from commodity exchanges

TP Catalyst offers:

- access to current and historical commodity prices data for transfer pricing analysis

Applications:

- due diligence and research
- arm's-length analysis (CUP/6th Method) on intra-group transfers of commodity type products

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