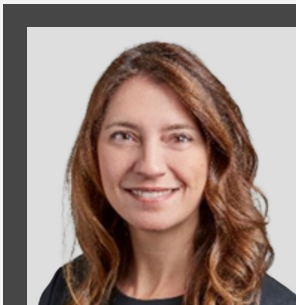




Recent controversy trends and their impact on your business

Your action guide

On our recent webcast, 78% of attendees were concerned about increased IRS funding, effects of Pillar One and/or success in pending controversy cases. Our PwC team weighs in on the important actions you can take today to stay resolution ready.

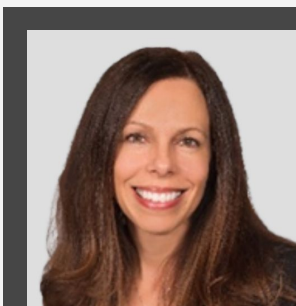


Danielle Smith

Principal, Tax Risk Management & Tax Controversy

ACTION: Identify risks early and formulate a plan

“Creating and promoting a holistic strategy is critical to managing risk and preparing for controversy. Day one readiness and strategic defense results in minimizing the spectrum of risk – from risk of assessment to reputational and people risk.”

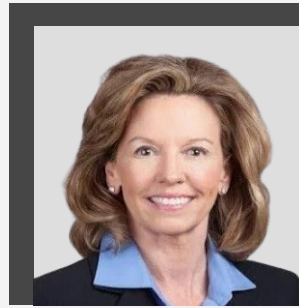


Kristina Novak

Principal, Transfer Pricing

ACTION: Achieve tax certainty

“Robust transfer pricing documentation is imperative for avoiding transfer pricing penalties, and Advance Pricing Agreements are a great option for achieving tax certainty and mitigating risk with respect to your transfer pricing.”



Beth Tucker

Managing Director, US Tax Controversy and Regulatory Services

ACTION: Prepare now

“As the IRS plans to hire 3,700 experienced enforcement personnel, now is the time to prepare for potential audits if you are a large corporation, large partnership or high wealth individual.”

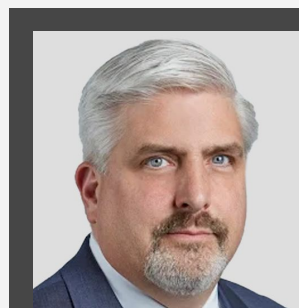


Nikole Flax

Principal, Tax Controversy & Regulatory Services

ACTION: Understand potential flags

“Given the recent activity in the market and increased use of data analytics, it is important that taxpayers not only stay abreast of where the IRS is heading, but they should also understand potential flags in their tax filings with a plan to explain.”



Rob Ozmun

Partner, State & Local Tax

ACTION: Stay informed about change

“One of the key drivers of controversy is change, so staying informed about the impact of tax positions is a key factor of support if audited. Additionally, taxpayers should document their positions and maintain audit ready files at the time the return is filed and/or position is taken.”