

Aibidia

INDUSTRY REPORT

Aibidia Report 2025: The State of Transfer Pricing

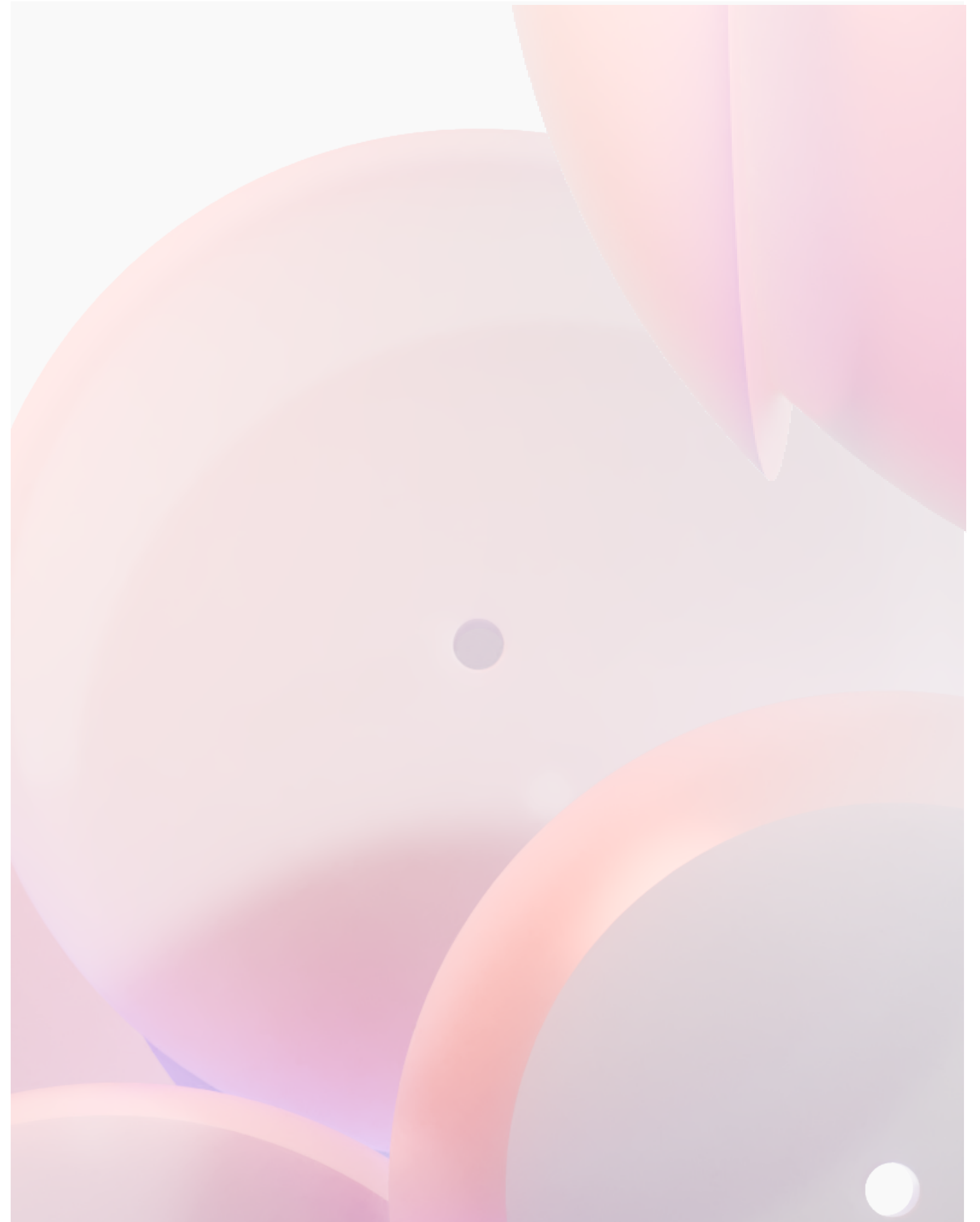


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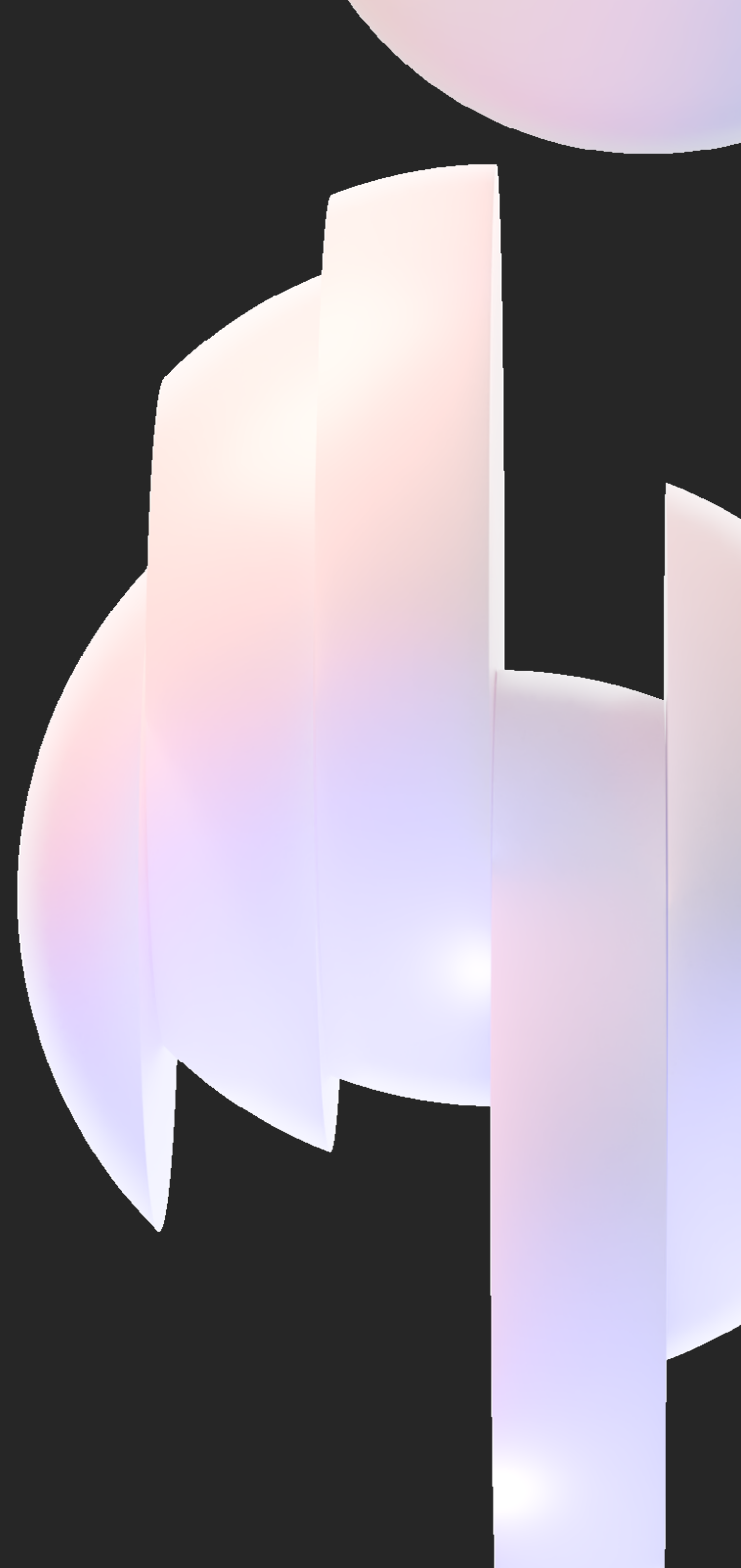
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SECTION 1

Introduction



Guest Foreword

At IBFD, our mission is to make trusted tax knowledge accessible and actionable for professionals worldwide through publications, training, research, and data. In today's complex and fast-changing environment, staying ahead of regulatory developments and enforcement trends is more challenging and more important than ever.

That's why we are extremely proud to support this year's Aibidia Industry Report. The insights shared here reflect the real challenges tax and transfer pricing teams are navigating: rising audit scrutiny, the operational impact of Pillar Two, and the increasing importance of structured data and technology. These are not abstract trends but practical issues facing in-house professionals every day.

We believe that better access to authoritative information, combined with the right tools and processes, empowers tax teams to make more informed, confident decisions. As technology continues to evolve, including through emerging capabilities like AI, our role remains the same: to support professionals with the knowledge and clarity they need to navigate change and drive progress.



Tjerk De Greef

Executive Board Member

Director Tech & Data

IBFD



Letter to Readers From Aibidia CEO & Founder,
Hannu-Tapani Leppänen

We are proud to introduce the Aibidia 2025 Report

This year's edition builds on our previous work and features insights from professionals across industries, functions, and geographies, all united by a shared goal: to make transfer pricing more efficient, strategic, and future-ready.

In this report, we explore some of the most pressing topics shaping the TP landscape today: the operationalization of transfer pricing (OTP), the increasing role of technology and automation, the impact of rising audit scrutiny, and the ways teams are responding through innovation, prioritization, and smarter data strategies.

Crucially, we take a closer look at the growing adoption of AI, the balancing act between compliance and risk, and the evolving expectations placed on TP teams in a global regulatory environment. These insights reflect not only the current state of the industry but also where it's heading.

At Aibidia, we continue to believe in the power of shared insight, that transformation happens faster when we learn from each other. That's why this report remains, above all, a platform for collaboration: a space for experts to share their experiences, challenges, and forward-looking strategies.

To the many contributors and collaborators behind this report, thank you. Your openness and expertise drive conversations that move our industry forward. We hope the insights here spark new ideas, new connections, and ultimately, new levels of impact in your own work.

Let's continue building a smarter, stronger, and more connected transfer pricing ecosystem, so that together, we can make transfer pricing and cross border business transactions, just happen.



Hannu-Tapani Leppänen

CEO & Founder

Aibidia

Why This Matters Now

The transfer pricing landscape is being redefined in real time.

From intensified audit pressure and the global uncertainty around Pillar Two to accelerating regulatory demands and rising expectations around data transparency, TP professionals are facing a more complex, more accountable operating environment than ever before - and are being asked to do more, faster, and with greater transparency. And while technology and automation promise transformation, most organisations remain in transition, navigating capability gaps, stretched resources, and legacy systems.

The Aibidia 2025 TP Industry Report draws insights from over 145 professionals worldwide. Their responses reflect not just the state of the profession, but its trajectory. What emerges is a profession under strain, but also adapting with intent.

Five themes define this moment:

This year's report is more than a snapshot, it's a signal. A profession once rooted in compliance is now moving with urgency toward strategic control, operational readiness, and smarter decision-making.

The challenges are steep. But so too is the momentum.

01 Transfer Pricing is Entering a New Era of Audit Exposure

Audit workloads and costs are climbing fast. Half of respondents now spend 50 to 200 hours on audit response, and high-cost cases have doubled. Yet only 13% of teams feel well prepared for this rise. Strengthening audit defence has become the top TP priority.

02 Operational Transfer Pricing: A Critical Execution Gap

Operational Transfer Pricing is widely adopted but weakly executed. Only 35% have well-defined processes, and most still rely on year-end true-ups. As expectations shift to on-time accuracy, execution gaps could become liabilities.

03 Data Maturity is the Foundation – But Still Out of Reach for Most

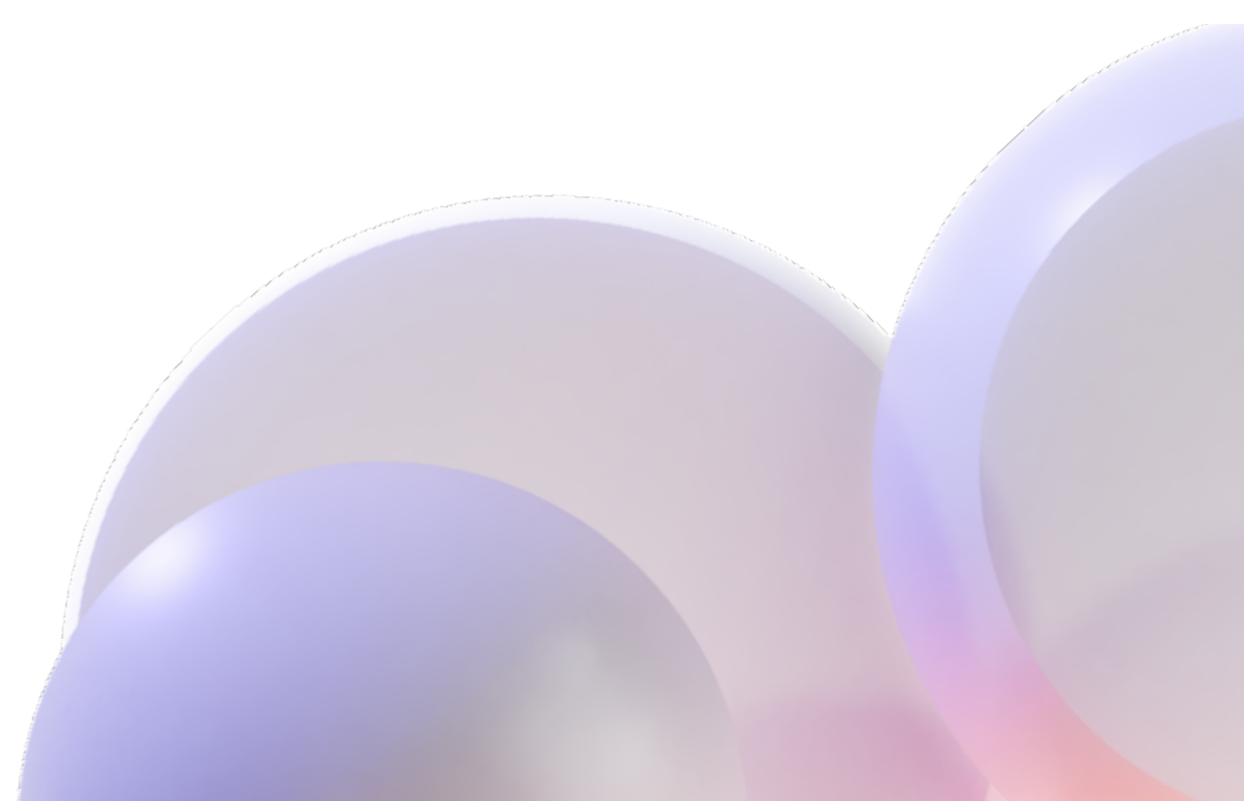
Structured data is essential, but still scarce. Most teams work with decentralized systems, and only 14% report heavy structured data use. Without reliable, centralized data, teams will struggle to scale, automate, and defend.

04 Technology Adoption is Growing, but Fragmented

Use of specialist TP software is rising, but full transformation is rare. Most teams are adopting tools case by case, with only 1% using end-to-end platforms. Data readiness and confidence are the main barriers.

05 Hybrid Resourcing is Standard

The idea of choosing between in-house or outsourced delivery no longer applies. 92% of teams utilize external advisors, regardless of size. Hybrid models are now the norm, offering flexibility and access to expertise, especially where data or bandwidth fall short.



Survey Respondent Profile

Participation in the Aibidia Industry Report survey grew significantly in 2025, reflecting the increasing interest and urgency around global transfer pricing practices. This year's expanded and more diverse respondent base provides richer insights and a more globally representative view of the TP landscape.

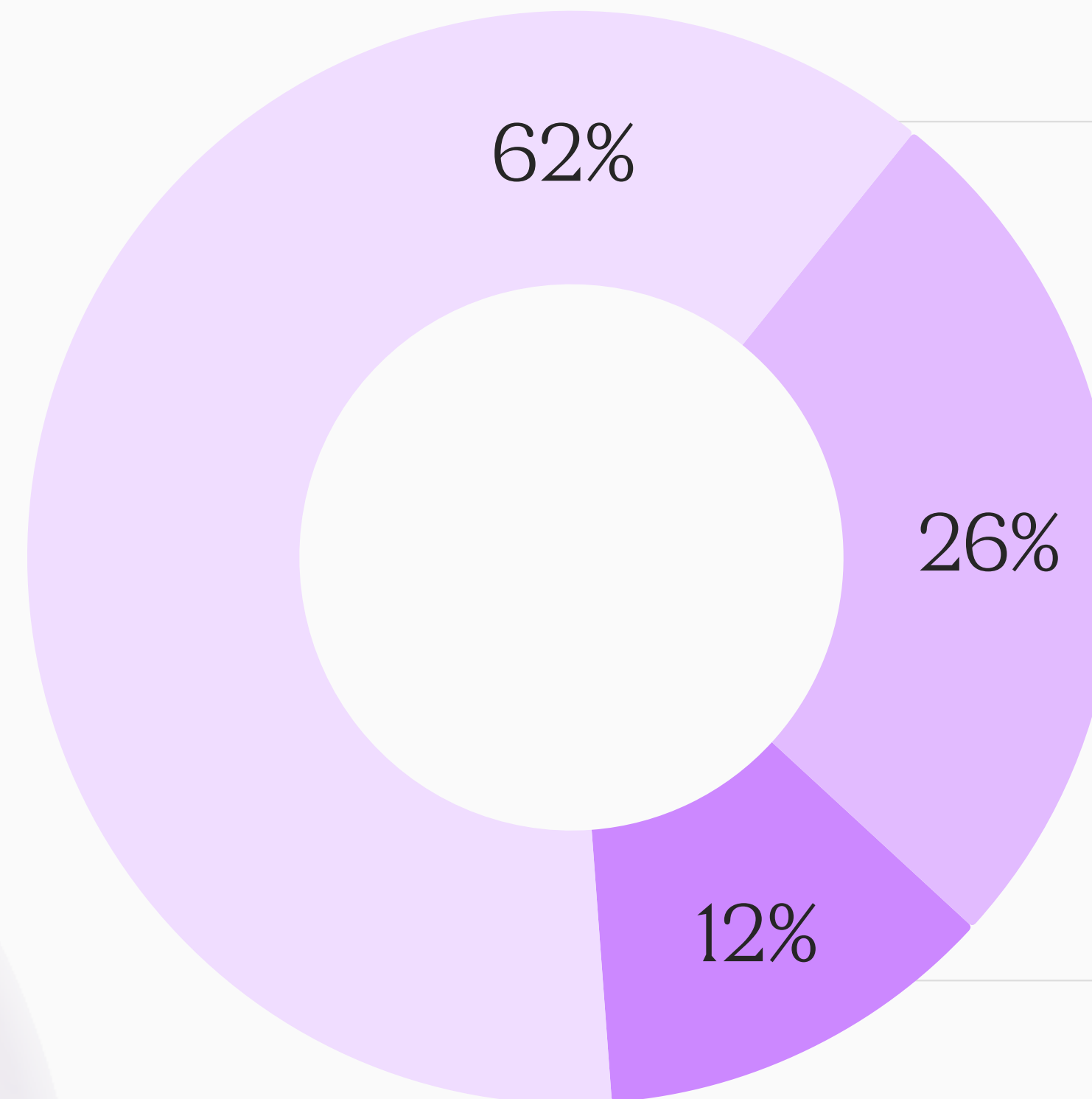


Participation Growth and Global Reach

148
professionals

This year's survey captured input from 148 professionals, up from 106 in 2024 a **38% increase in participation.**

Participants



62% In-house Professionals

Providing critical TP insights from inside multinational enterprises.

26% Advisory Professionals

Contributing valuable cross-client insights on regulation, audit trends, and technology use.

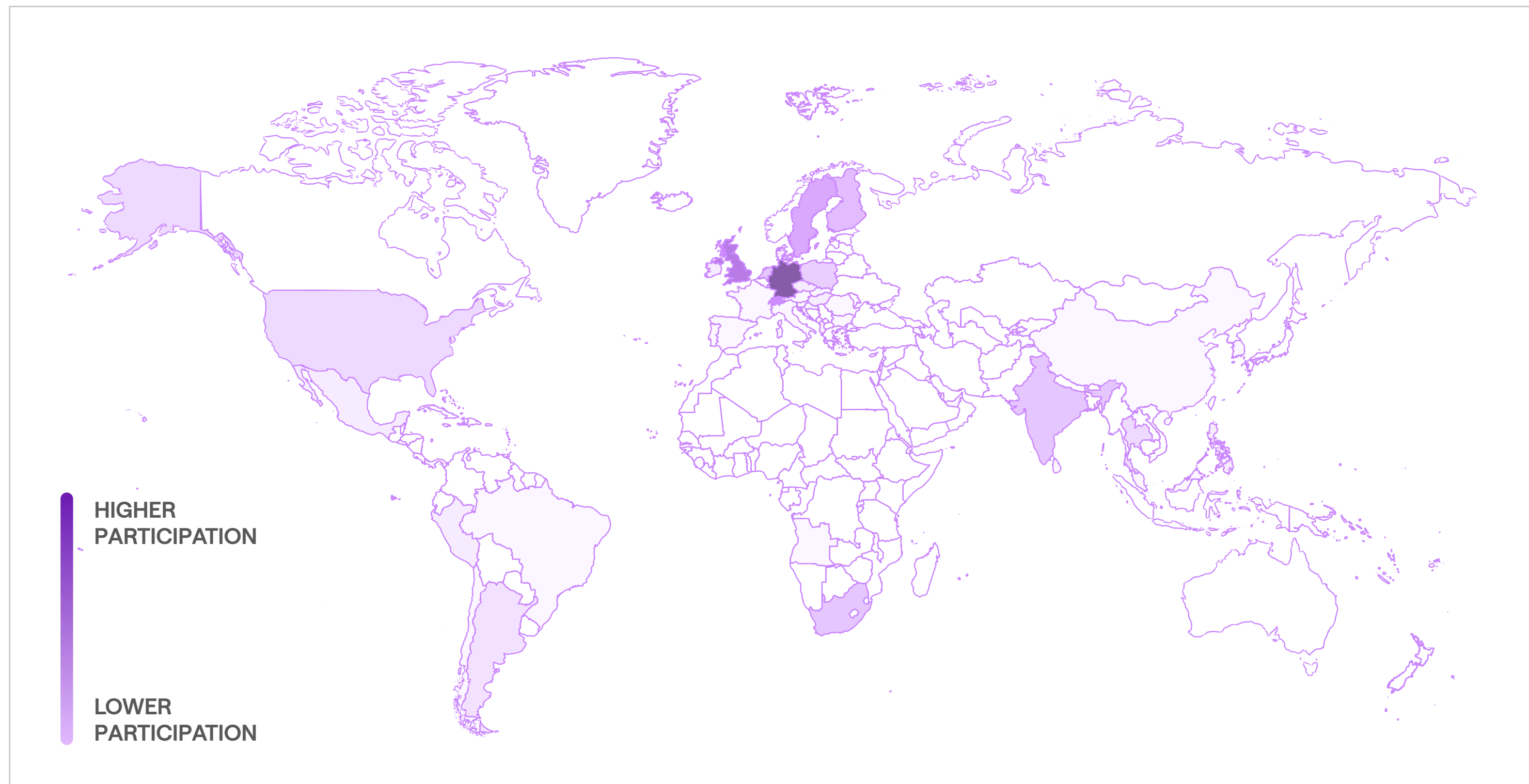
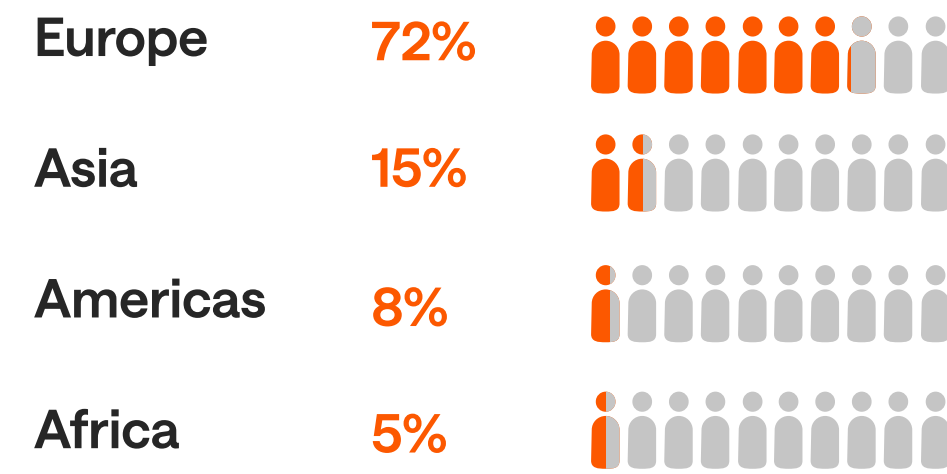
12% Other Stakeholders

Including academics, regulators, and industry observers, offering broader and more diverse perspectives.

Survey Respondent Profile

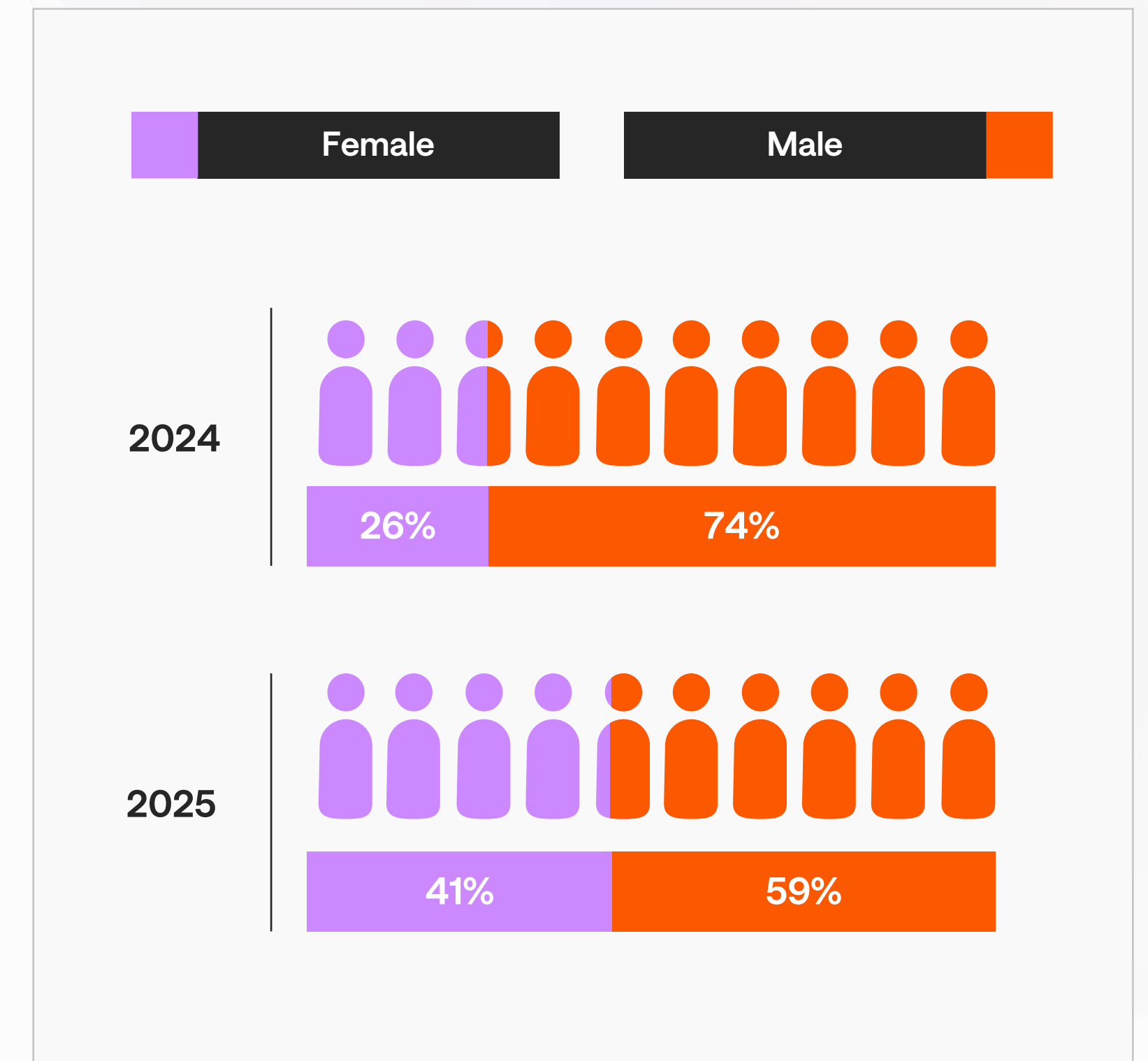
Geographical Distribution

While Europe continues to generate the most responses, participation from Asia, the Americas, and Africa expanded significantly, offering a broader view of regional transfer pricing dynamics and regulatory pressure.



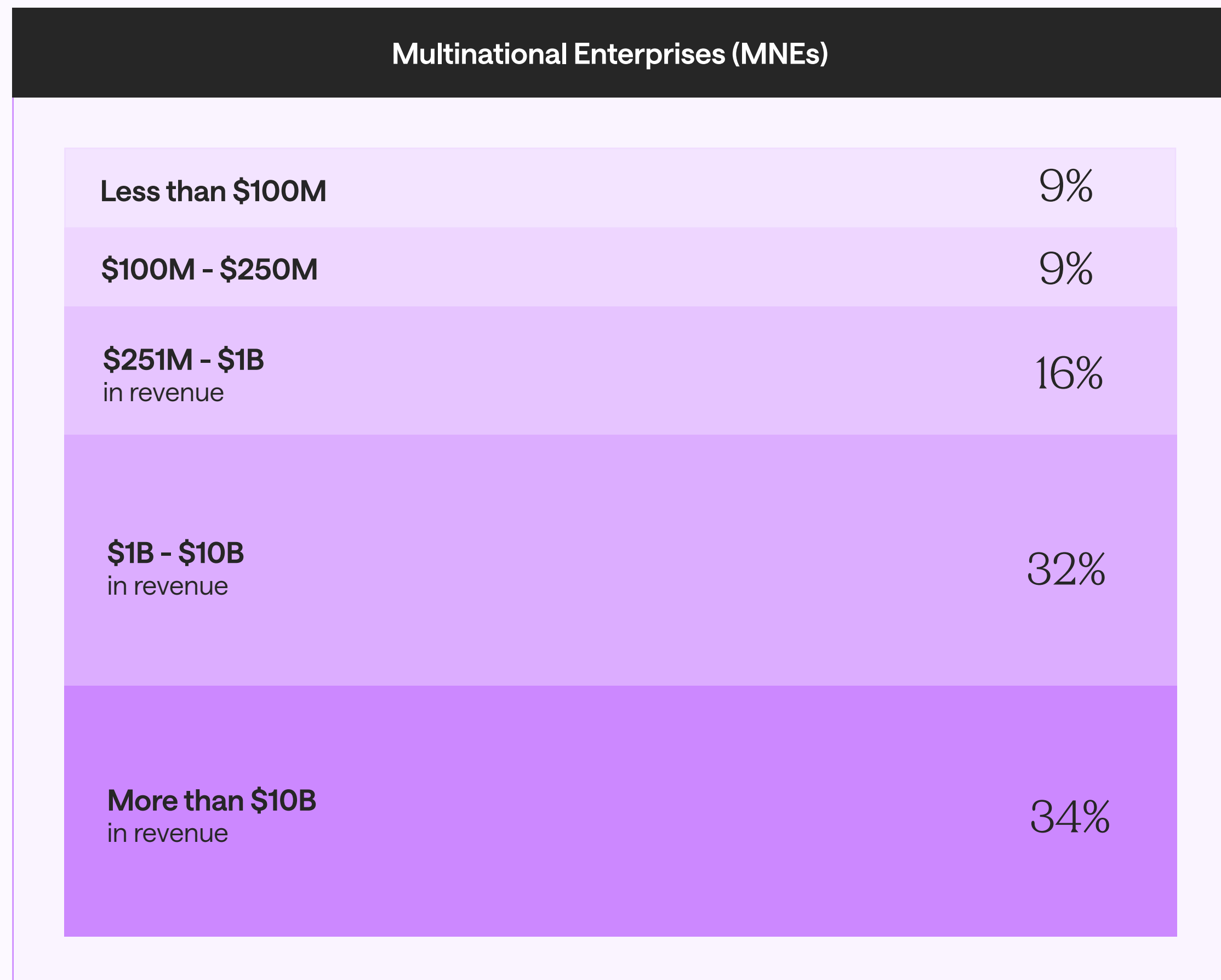
Improved Gender Representation

One of the most notable shifts in 2025 was in gender representation. In 2024, only **28 respondents (26%)** identified as female. In 2025, that number more than doubled to **60 respondents**, raising female representation to **41%**.



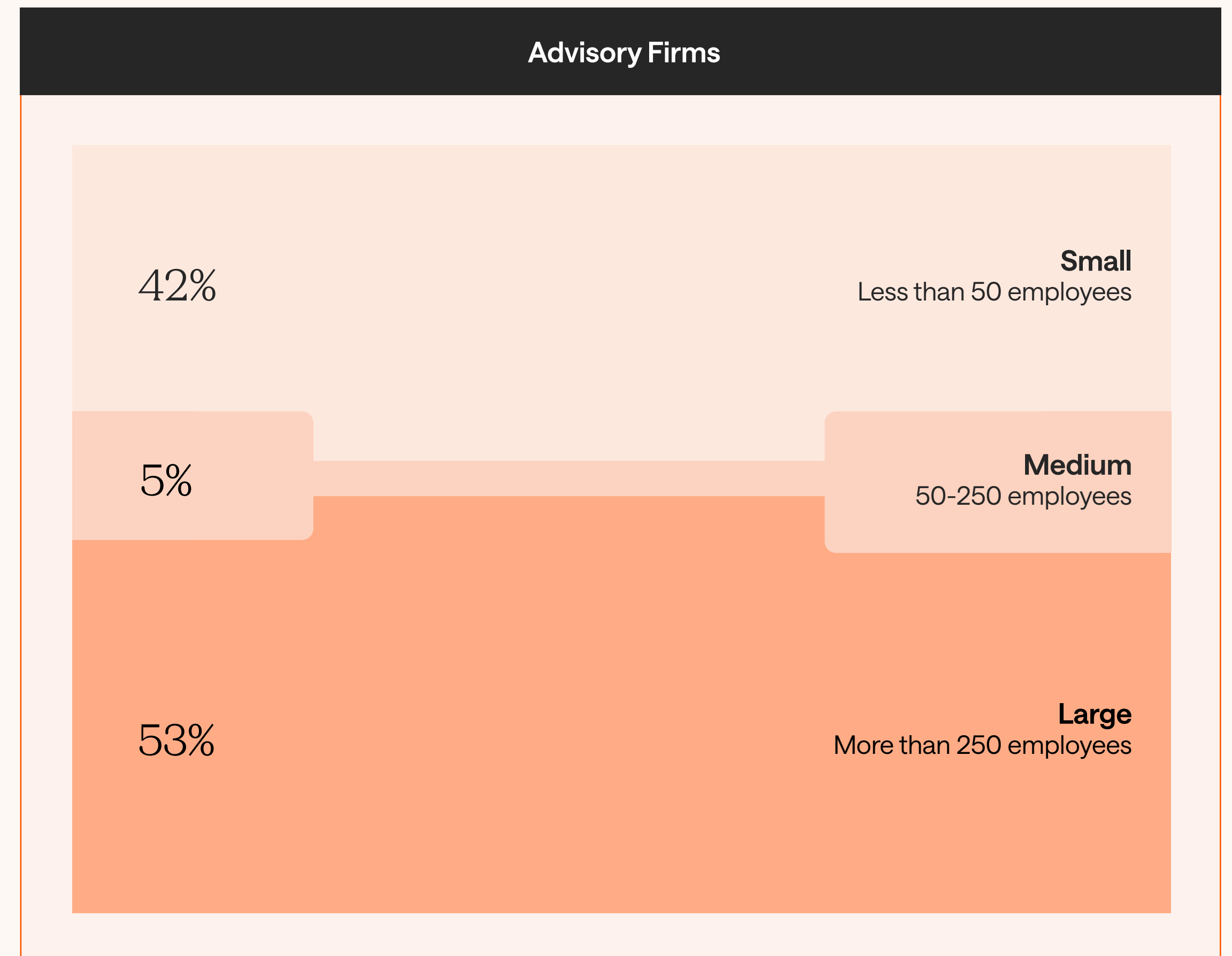
Size of MNEs Participating

65% of in-house tax and transfer pricing respondents represented **multinational enterprises with revenues exceeding \$1 billion** (33% had over \$10bn revenue). When including all in-house teams at MNEs with revenues above \$250m, the figure rises to 81% of participants. The insights captured are highly relevant for companies navigating complex, multi-jurisdictional operations.



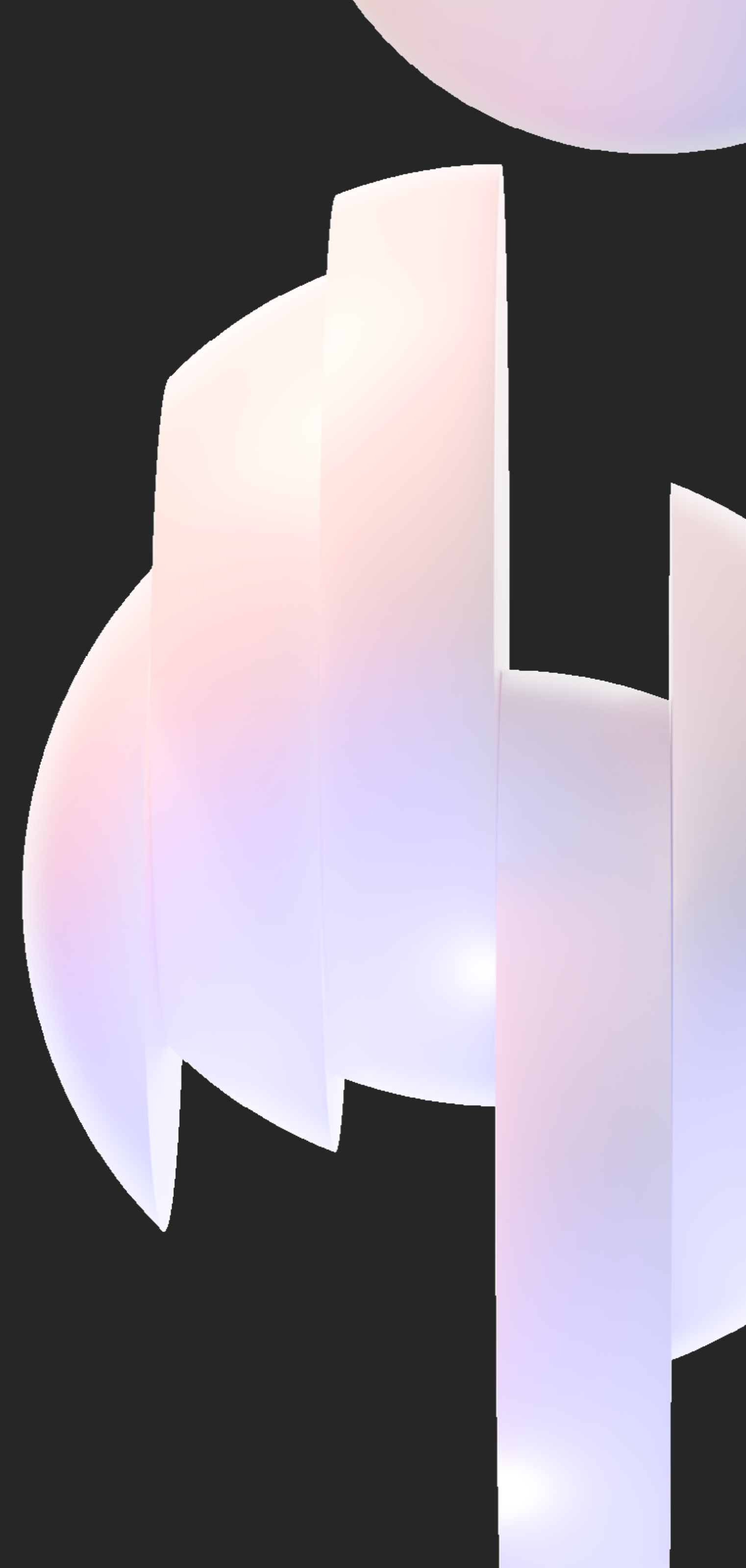
Size of Advisory Firms Participating

The 2025 survey saw participation from **39 advisory professionals**, a notable increase from the 27 in 2024. This year's advisory cohort skewed larger, with **53% representing firms with over 250 employees**, up from just 33% last year. At the same time, **42% came from boutique firms with fewer than 50 employees**, consistent with 2024's 41%. Only **5% of respondents came from mid-sized firms (50–250 employees)**, down from 26% the year prior.



SECTION 2

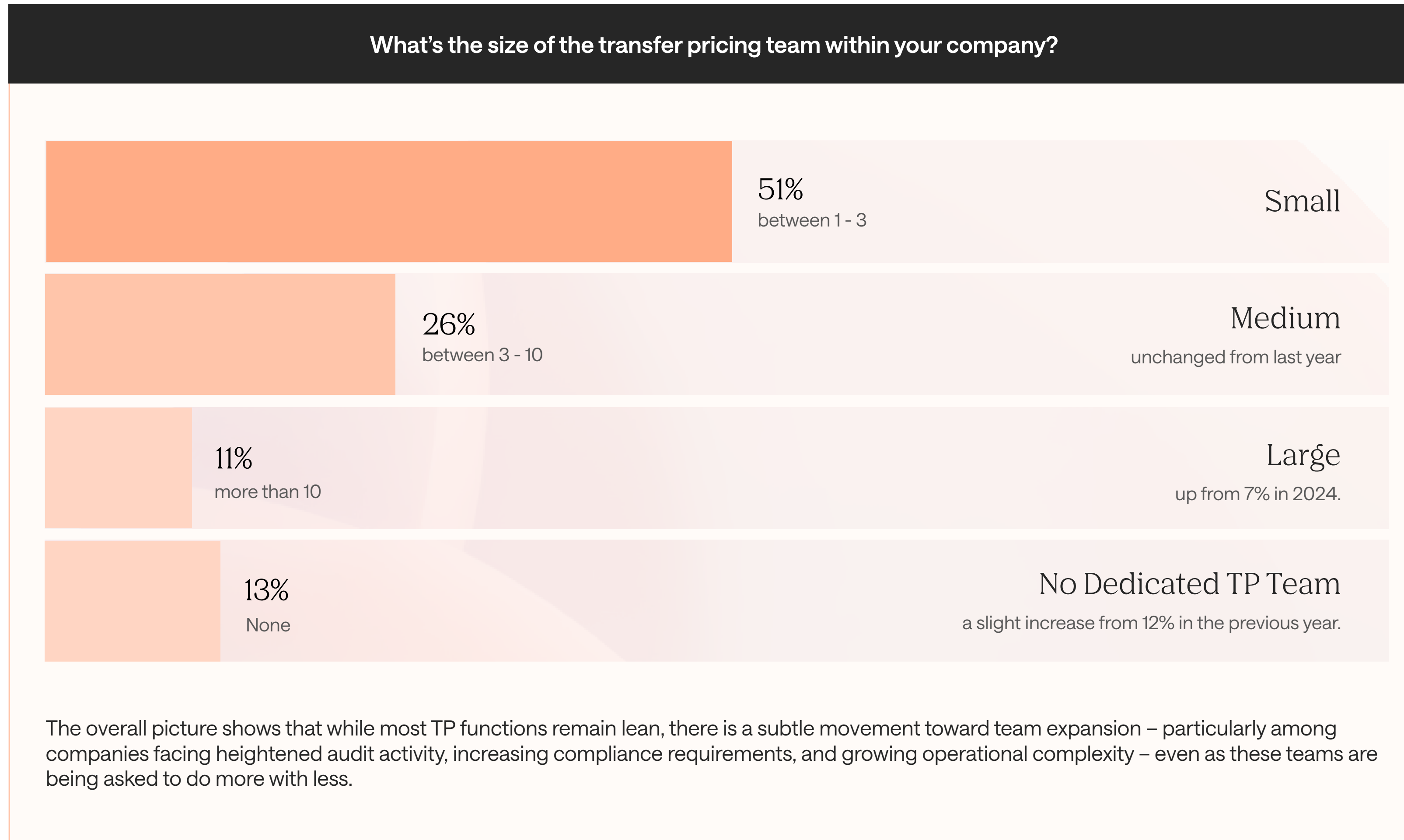
In-house Professionals



The Size of Transfer Pricing Teams in Multinationals

Lean but Evolving: Most Teams Remain Small

In 2025, 51% of companies maintain TP teams of just 1–3 full-time employees (FTEs), consistent with the 55% reported in 2024. However, we see a small but important uptick in more heavily staffed teams.



Team Size Breakdown: 2024 vs. 2025

Team size	2024		2025
Small	55%	↓	51%
Medium	26%	=	26%
Large	7%	↑	11%
None	12%	↑	13%

TP Team Size by Revenue Band

The 2025 heatmap provides a detailed, at-a-glance view of how TP team size scales across revenue bands. Each tile represents the share of companies within a revenue bracket that fall into a specific team size band, offering a more nuanced understanding of resourcing strategies across the market.

01 Still Lean at Scale: The \$1B–\$10B Plateau

A striking **75% of companies in the \$1B–\$10B** revenue range have TP teams of just **1-3 FTEs**.

This suggests that while these companies are large and likely face complex cross-border compliance obligations, **most still rely on lean, tightly focused teams** to manage their transfer pricing function.

Only 22% of this group have grown beyond 3 FTEs, indicating some movement toward scaling, but not widespread transformation yet.

02 The Largest Companies Are Scaling Up

Among companies with more than \$10B in annual revenue, 23% now have TP teams exceeding 10 FTEs, and nearly half (**48%**) **operate with 3-10 FTEs**.

This is a shift from last year, where large TP teams were more rare, even at the top end of the market.

The trend reflects a **growing investment in internal capabilities**, likely driven by regulatory complexity (e.g., Pillar Two), audit defense needs, and a desire for greater operational control.

03 Mid-Market MNEs Are Building In-House Muscle

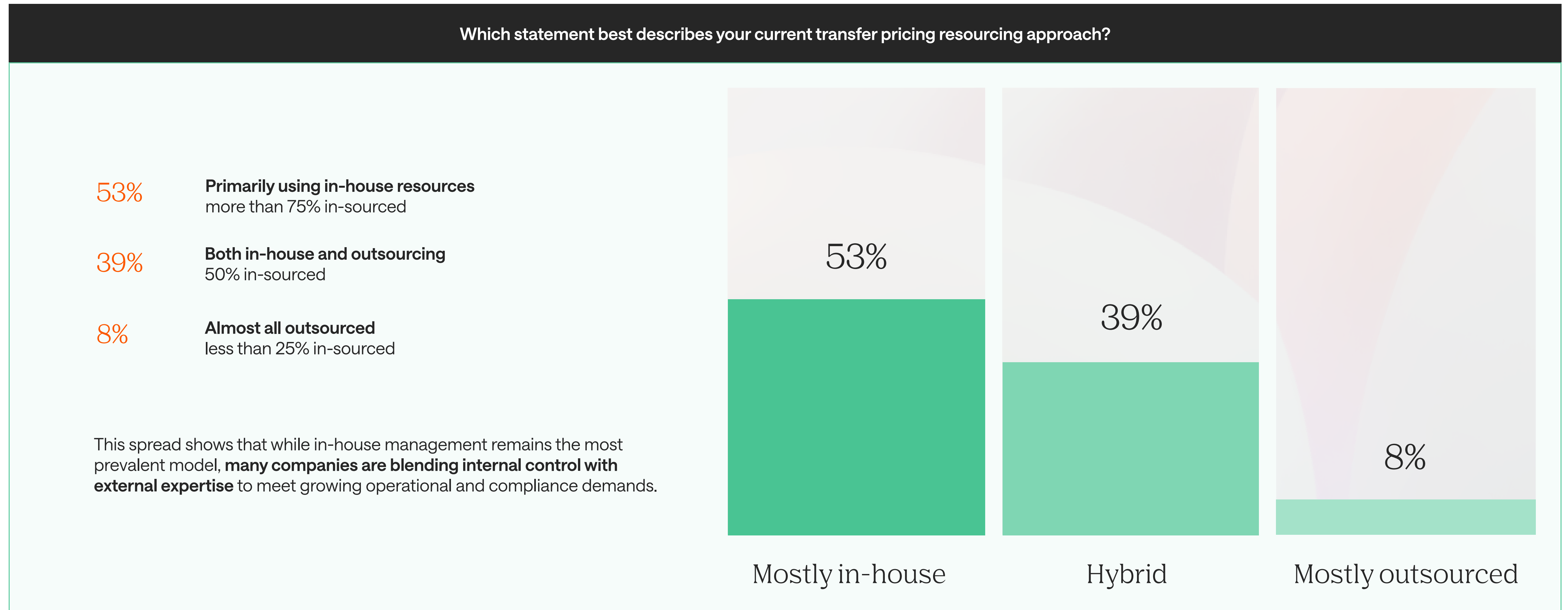
In the **\$251M–\$1B** band, **64% of companies operate with 1-3 FTEs**, and 14% have teams of 3-10, a sign that mid-sized MNEs are investing more seriously in internal TP functions.



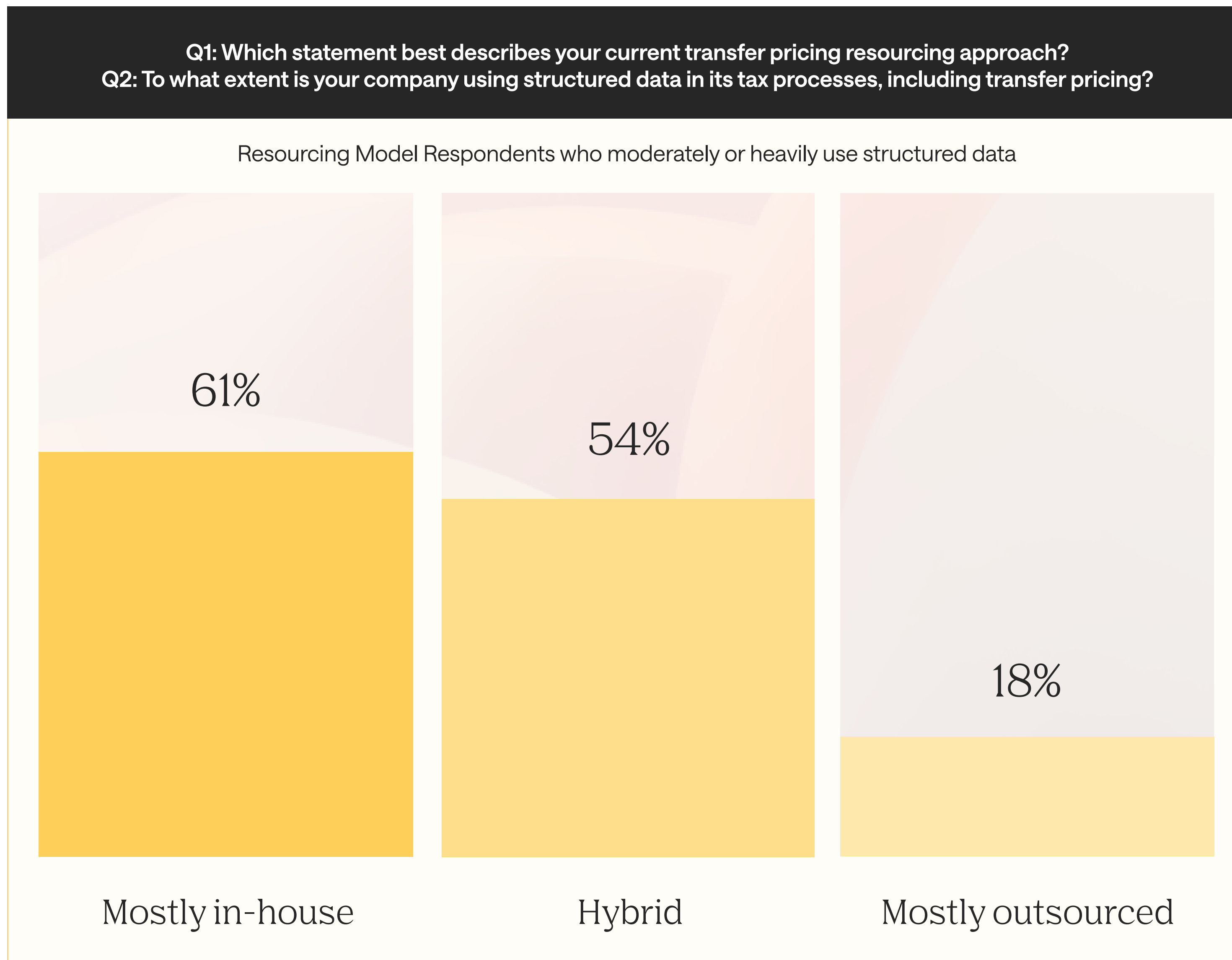
Transfer Pricing Resourcing Approaches

Resourcing Models Reflect a Strategic Mix of Control and Flexibility

As transfer pricing functions mature, their resourcing approaches continue to evolve. In 2025, a **clear majority of companies still favor internal ownership**, but hybrid models combining internal teams with outsourced support are increasingly common.



Internal Resourcing Correlates with Data Maturity



Survey results also indicate a notable correlation between resourcing models and the level of structured data usage

These figures suggest that organizations with more in-house TP responsibility are also more likely to have invested in structured, centralized data systems. While causality isn't established, the pattern indicates that **building internal capacity may go hand-in-hand with better-organized data and more consistent transfer pricing processes.**

Strategic Choices May Play a Role Beyond Company Size

Although company size typically influences team scale, the 2025 data shows that even very large companies (\$10B+ in revenue) do not uniformly adopt in-house models. Many still choose hybrid or outsourced strategies. This variability suggests that **governance philosophy, risk appetite, and organizational priorities** may also shape resourcing decisions.

While these interpretations are not directly measured in the survey, they align with expert observations and provide a possible explanation for the diversity of approaches among firms with similar scale and complexity.

“

Expert Insight

"More in-house control means stronger data maturity, where technology acts like the bridge that makes it possible. The report data shows that when companies take ownership of transfer pricing and harmonize their data, they're better positioned to implement structured, centralized systems and gain control and visibility over their processes.

At Aibidia, we see this every day: technology enabling teams to manage complexity, improve consistency, and turn transfer pricing from a compliance exercise into a strategic advantage."

Pia Honkala

Global Commercial Head - Operational Transfer Pricing

Aibidia



RELYING ON ADVISORS

Key Takeaways

Internal ownership remains dominant

but hybrid models are on the rise, offering flexibility in managing complexity.

Structured data usage is strongest

among firms managing TP in-house, suggesting a link between internalization and process maturity.

Resourcing decisions vary significantly

even among similarly sized companies, indicating that strategy - not just scale - may be a key driver.

Outsourcing continues to serve a complementary role

often focused on specialized support, bandwidth, or local expertise.

Relying on Advisors

Complexity is rising faster than headcount can absorb

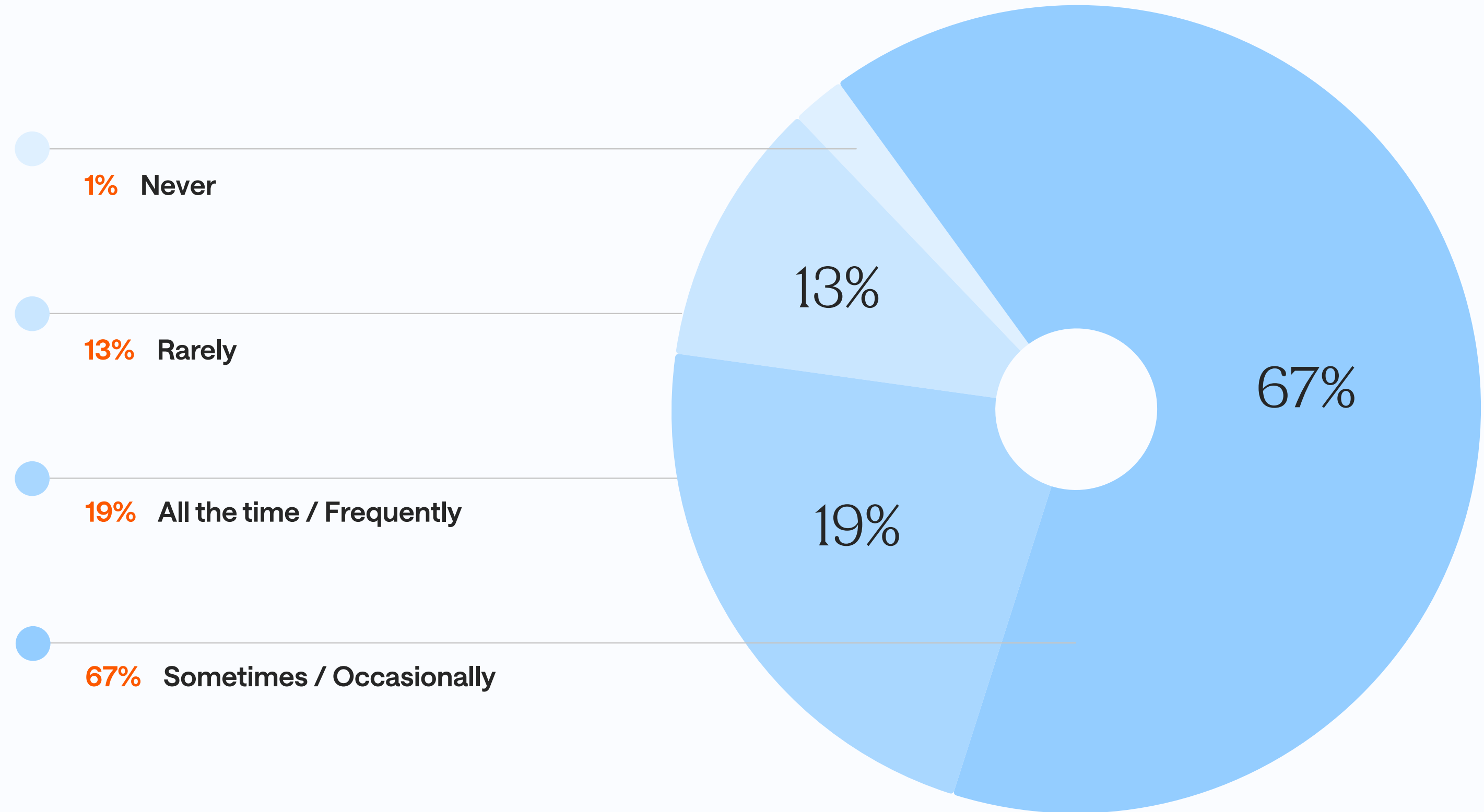
Reliance on external advisors remains widespread across transfer pricing (TP) functions. Whether due to lean staffing, decentralized data, or regulatory complexity, most organizations (regardless of size) build advisor engagement into their operating models.

How often does your company seek external specialized advice or support for complex transfer pricing issues?

Advisor use is embedded in the TP operating model; most in-house teams rely on advisors at least occasionally with less than 1% reporting 'never' engaging external expertise.

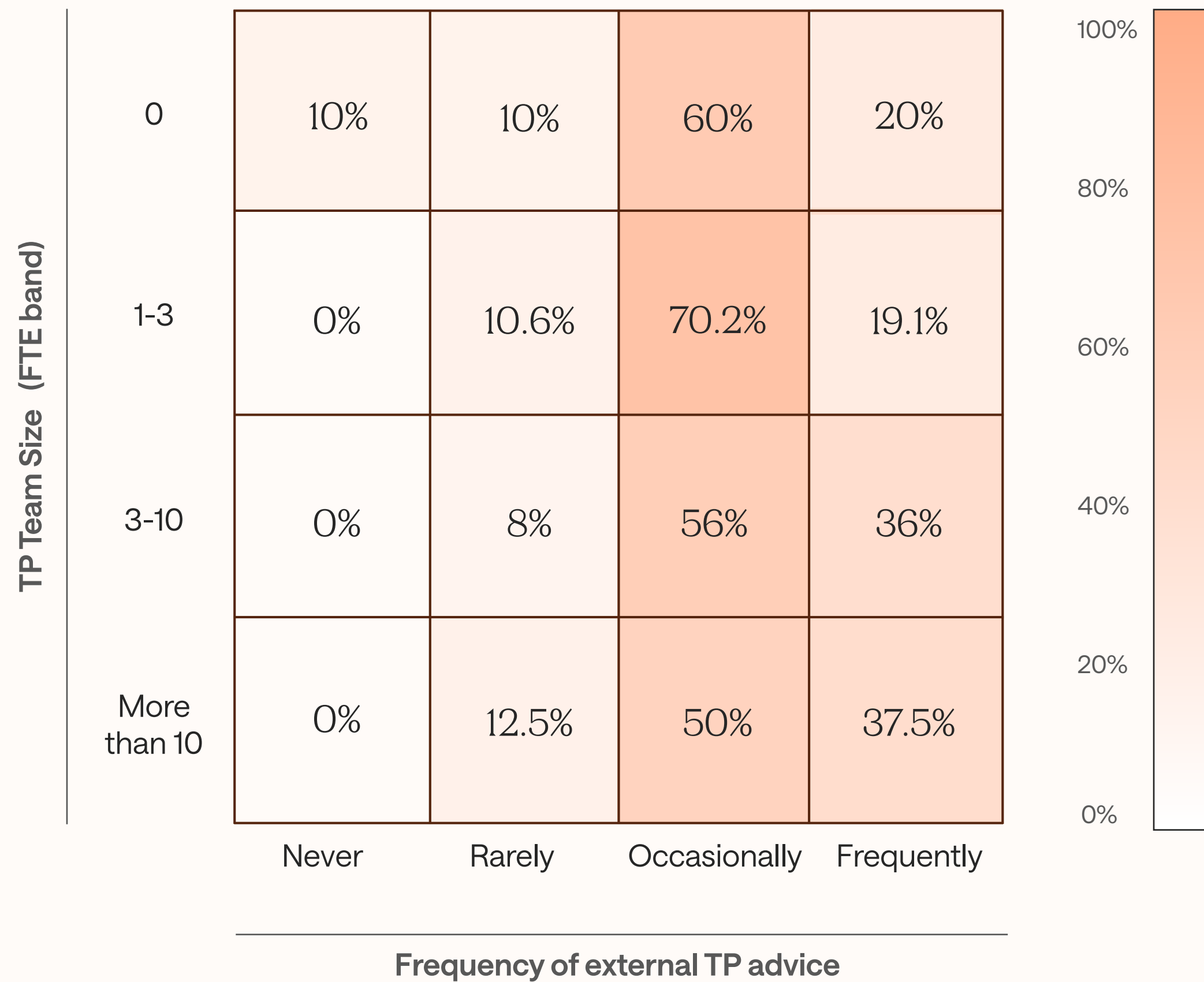
What's obvious is the market has normalized hybrid resourcing where advisors supplement internal efforts.

Digging deeper this year, we explored if there are any impacts on seeking advisor support based on team size and in-house data maturity.



Team Size & Advisor Engagement

Q1: How often does your company seek external specialized advice or support for complex transfer pricing issues?
 Q2: What's the size of the transfer pricing team within your company?



Among companies with **0–3 full-time TP staff (FTE)**, **60–70%** engage external advisors occasionally, and about 20% do so frequently or always.

For **teams with 3–10 FTE**, **36%** report frequent advisor use, and 56% seek help occasionally.

Large TP teams (10+ FTE), **38%** use external advice frequently, with half doing so occasionally.

Reliance does not diminish as team size (and revenue level) grows. This suggests advisory need is not simply about capacity, but capability and specialization. Large teams face complexity that internal roles don't always cover, perhaps prompting use of external niche experts or surge support.

It's clear from the data that even with in-house centers of excellence, external support remains a core strategic layer.



Expert Insight

“Tax teams need to establish which transfer pricing tasks should be insourced and which should be externalized. Great value can be generated from such allocation based on the budget and internal resources. This is turning out to be essential for tax teams to remain efficient and optimize performance.”

Raphaël Barelli Schaefer

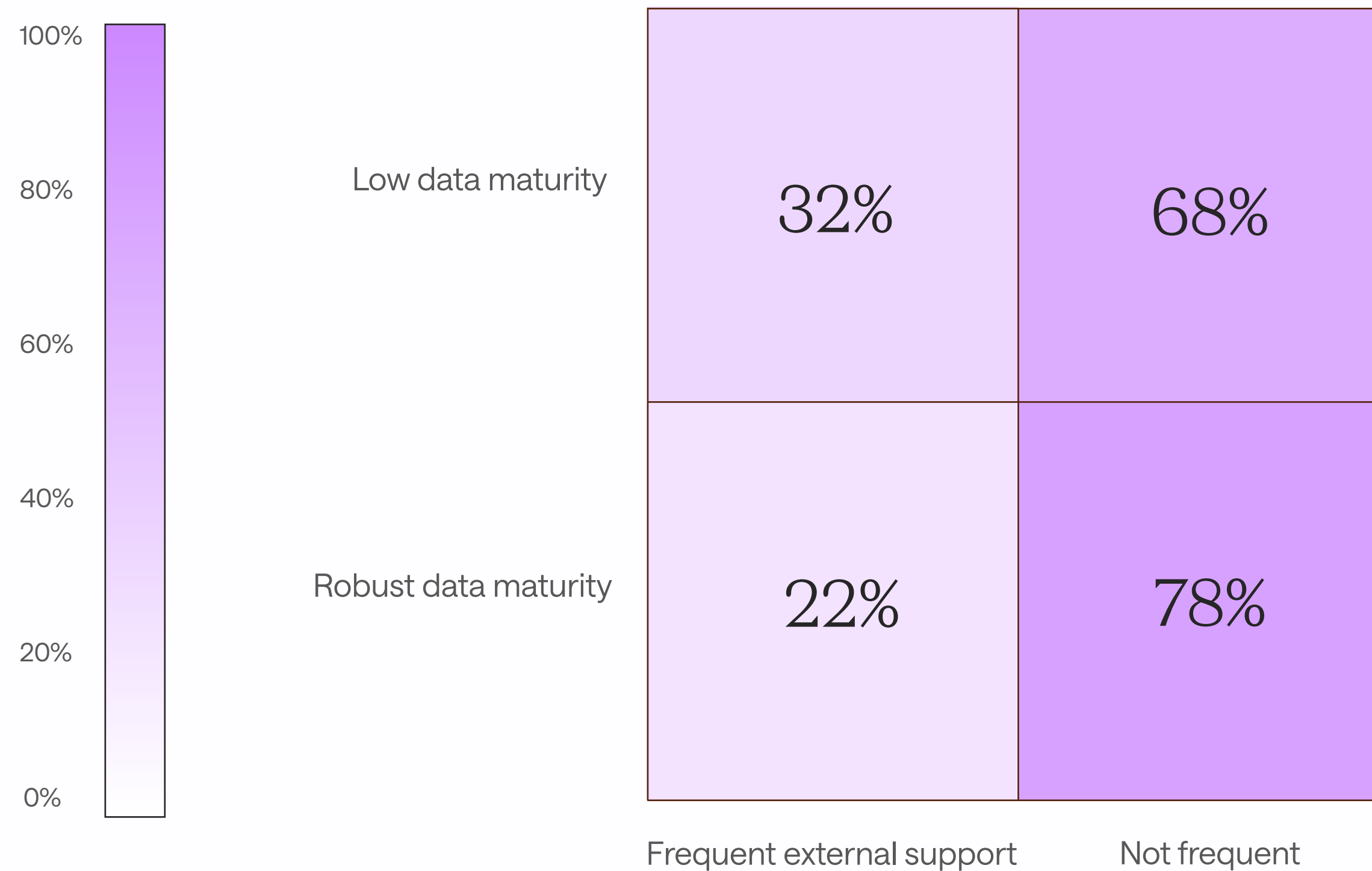
Tax and TP Senior manager

Yanfeng International



Data Maturity Empowers Self-Sufficiency

Q1: How often does your company seek external specialized advice or support for complex transfer pricing issues?
Q2: To what extent is your company using structured data in its tax processes, including transfer pricing?



When cutting the response data a different way and looking at data maturity instead of team size, one potential insight emerged. **32% of the In-house TP teams who self-described as having 'low data maturity' claimed 'Frequent' use of external advisors**, whilst only 22% of teams who self-described as having 'high data maturity' said the same. A 10% swing suggests a correlation between better-structured TP data environments and a reduced reliance on external expertise.

RELYING ON ADVISORS

Key Takeaways

Hybrid Resourcing Model Still the Standard

Advisor support is near-universal, used across all team sizes; advisors are a structural part of modern TP operations.

Team Size ≠ Independence

Even large in-house teams engage advisors heavily, suggesting that rising complexity and regulatory change require more than just headcount to manage effectively.

Data maturity empowers self-sufficiency

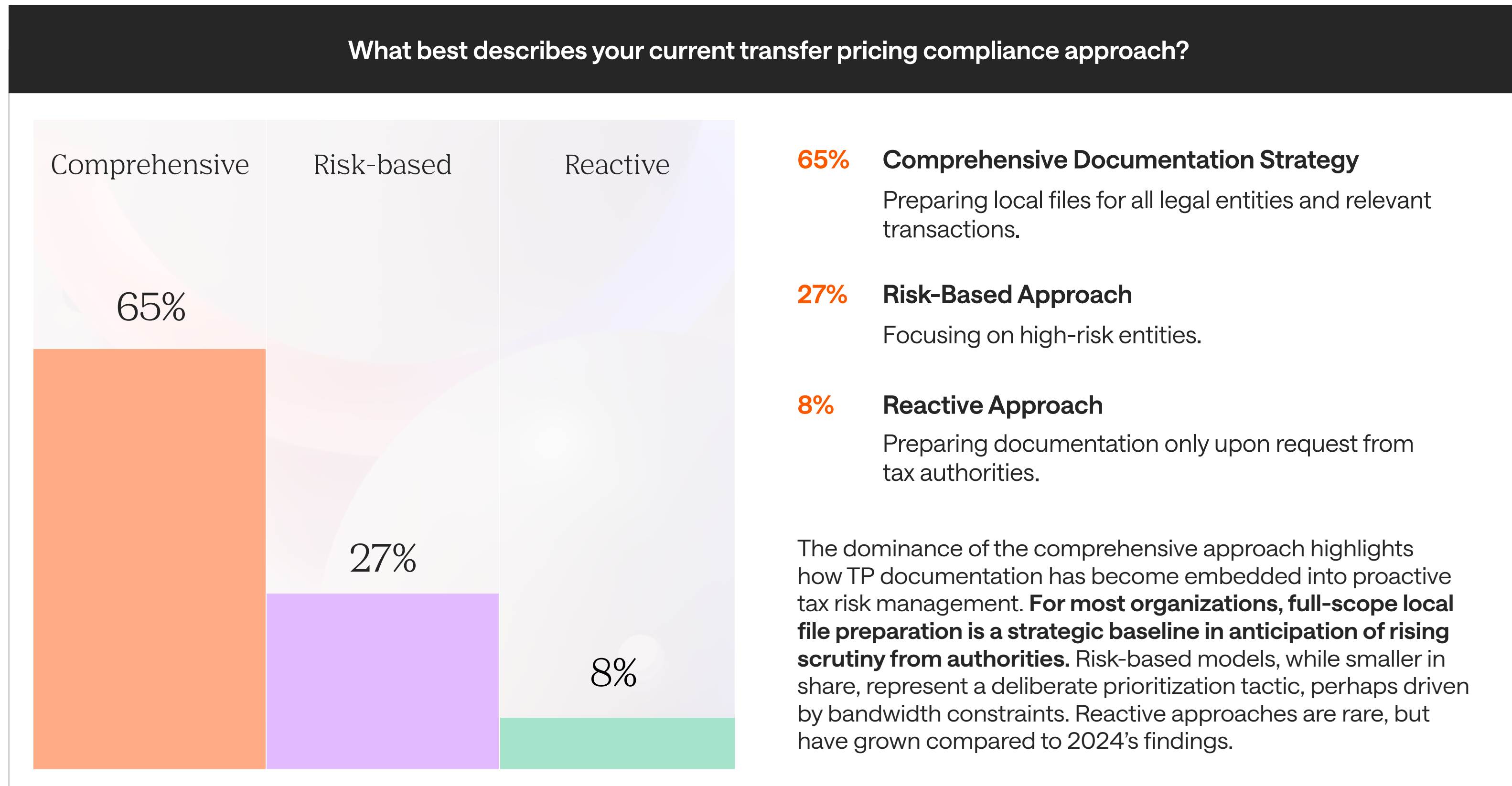
High quality, structured data enables TP teams to handle more internally - a 10% reduction in frequent advisor use for those with 'high data maturity' suggests this.

Transfer Pricing Compliance Approaches

How strategy, structure, and systems shape documentation choices

Global TP compliance remains a balancing act between thoroughness, practicality, and risk exposure. Most MNEs lean toward comprehensive documentation, but the approach is nuanced by resourcing models and data readiness.

A review of compliance approaches



What changed from last year? 2024 vs. 2025

Compared to last year, there's no radical shift. However, a small cohort (2%) is easing off proactive documentation, perhaps betting on audit-defense readiness over blanket coverage. And there's a modest yet notable rise on those adopting a fully reactive approach (4-8%) which could reflect resource-stretched teams that have postponed full documentation while tackling other priorities.

Compliance Model	2024		2025
Comprehensive	67%	↓	65%
Risk-based	29%	↓	27%
Reactive / Ad-hoc	4%	↑	8%

Compliance approach by resourcing model

Q1: What best describes your current transfer pricing compliance approach? Q2: Which statement best describes your current transfer pricing resourcing approach?

To better understand what drives transfer pricing compliance strategy, we cross-referenced respondents' documentation approaches with their resourcing models (see section, 'Transfer Pricing Resource Approaches'). These models describe how TP work is delivered whether primarily in-house, largely outsourced, or managed through a hybrid mix of internal teams and external advisors. By layering these two datasets, we aimed to determine whether an organisation's resourcing model has a measurable impact on its approach to documentation.

- **Comprehensive** - all entities
- **Risk-based** - high value/risk
- **Reactive** - on request

Mostly in-house

76% apply a comprehensive approach.

Mixed approach (in-house + outsourcing)

64% comprehensive, 27% risk-based, 9% reactive.

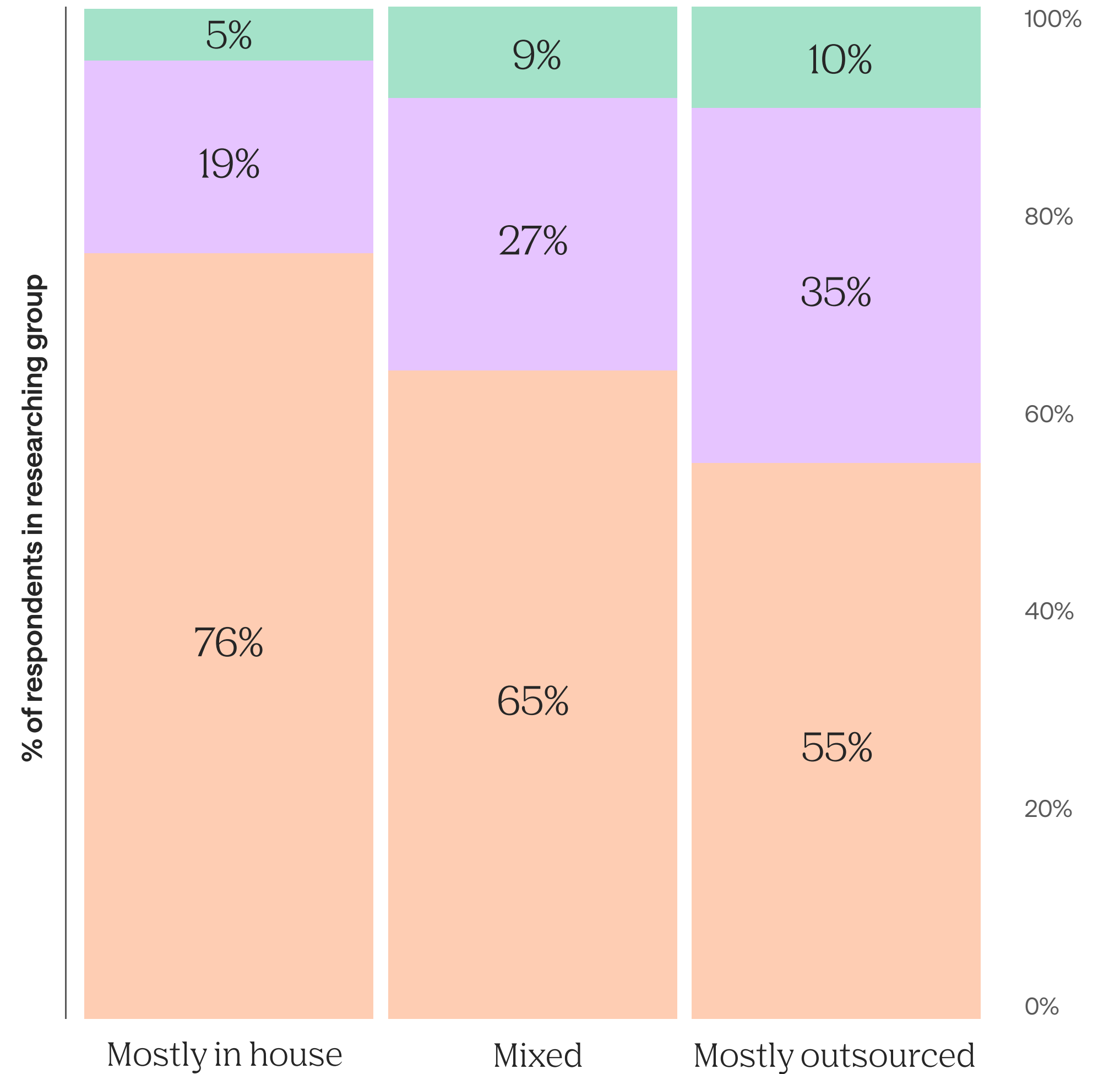
Mostly Outsourced

55% comprehensive, 35% risk-based, 10% reactive

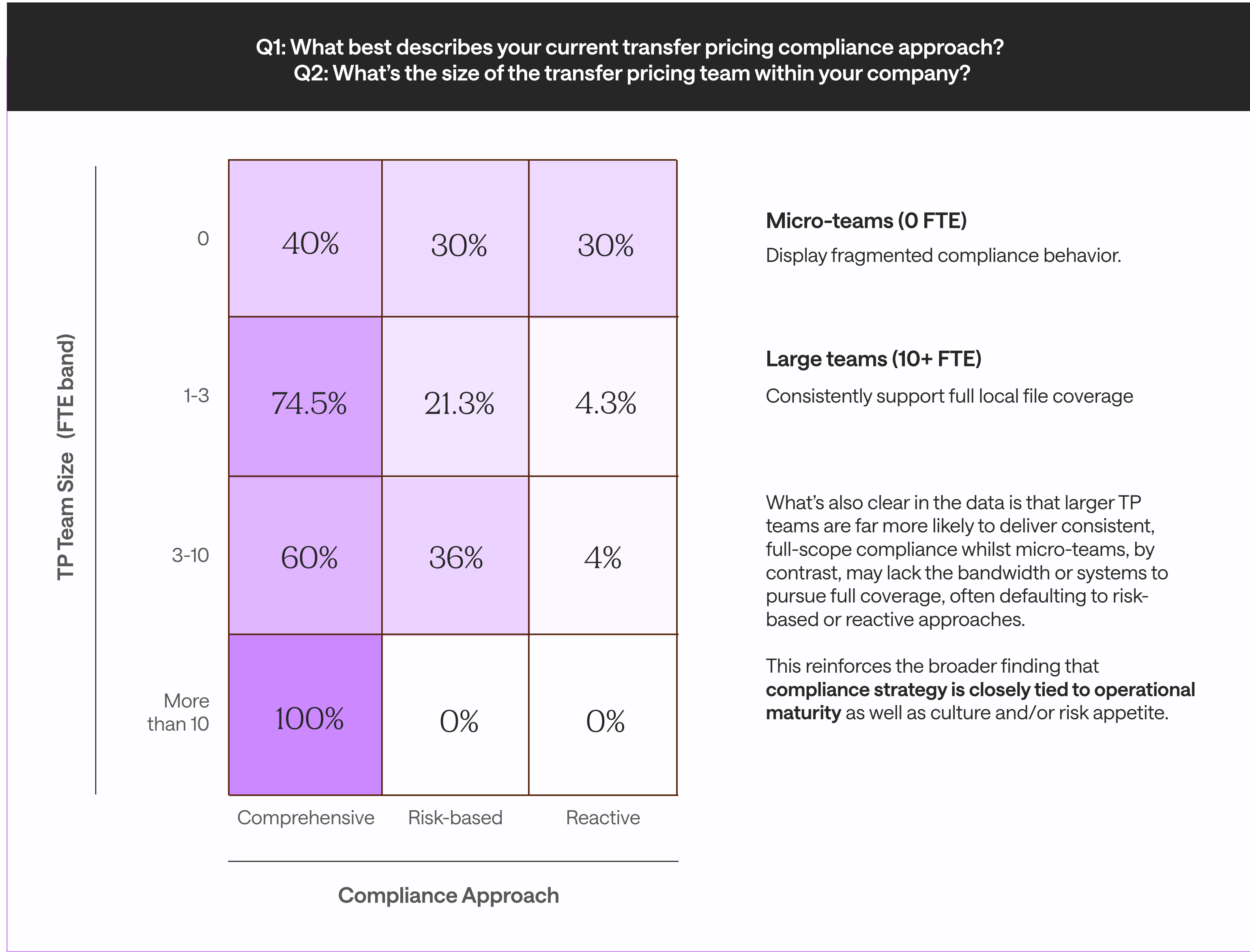
The data shows a **clear link** between compliance approach and how TP work is resourced.

In-house teams are far more likely to pursue comprehensive documentation. As resourcing shifts toward hybrid or outsourced models, risk-based and reactive strategies become more common, reflecting practical trade-offs in coordination, cost, and access.

This trend is further reinforced by the role of data maturity (see section, Data Maturity Empowers Self-Sufficiency); teams with better-structured TP data reported lower utilisation of external advisors, and here, those utilising advisors less than their peers, claim a higher capacity to execute full-scope compliance. In short, structured TP data delivers a two-fold advantage: it empowers teams to handle more in-house and enables more consistent, full-scope compliance.



Team Size and Compliance Behavior



TRANSFER PRICING RESOURCING APPROACHES

Key Takeaways

Comprehensive is default – when capacity allows

The vast majority of in-house-led teams aim for full documentation coverage. Strategy shifts when resources are stretched or externally managed.

Compliance approach reflects internal maturity, not just risk appetite

Risk-based and reactive strategies often stem from data sourcing limitations or reliance on advisors - not necessarily therefore from aggressive tax positioning.

Structured data enables scale

Better internal data has a two-fold benefit, not only reducing reliance on external advisors but increasing the ability of TP teams to execute documentation at scale.

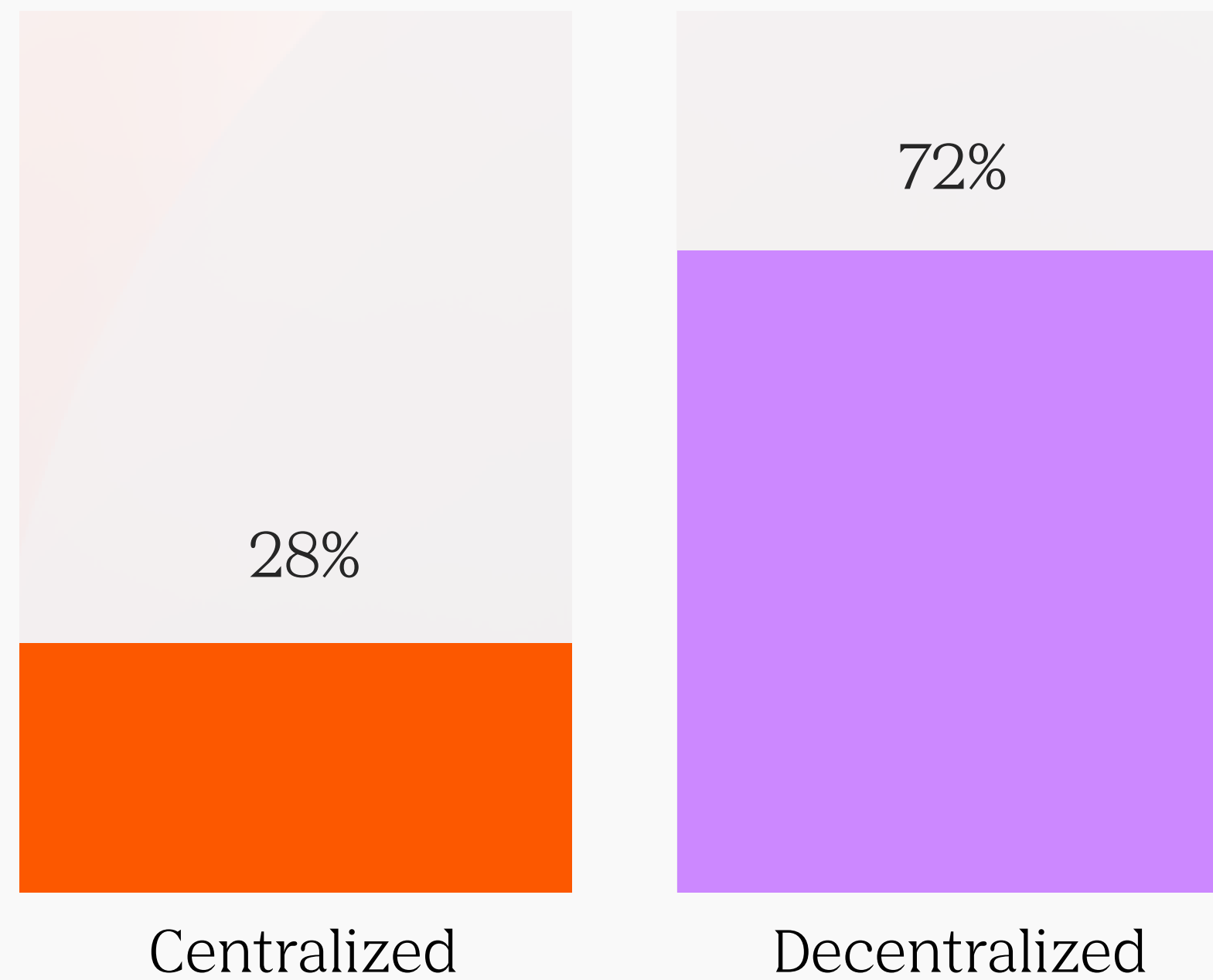
Data in Transfer Pricing

From storage to strategy: unlocking data's true value

Data maturity is widely recognized as the backbone of modern transfer-pricing operations, yet the 2025 results show most MNEs are still working with fragmented systems and only limited use of truly structured TP data. Turning data into a reliable, structured asset hinges on governance, tooling and cross-functional effort.

Data Management Models: Centralized vs Decentralized

Which statement best describes your current process of collecting data for transfer pricing analysis and compliance?



Decentralized dominates

72% of companies still rely on **decentralized systems**, extracting TP data from multiple sources, tools or spreadsheets.

Centralized

Just **28%** operate with a **centralized** setup.

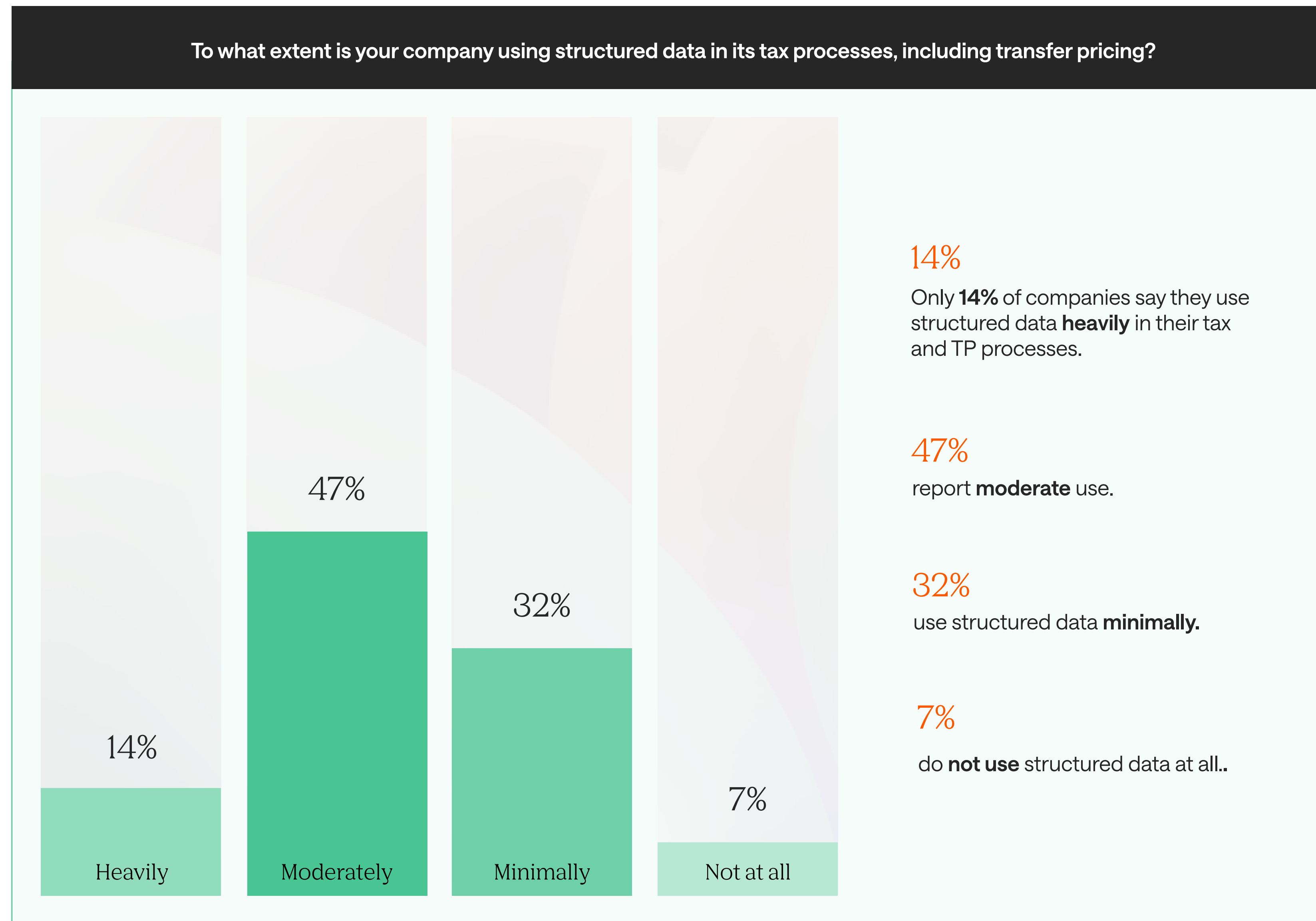
2024 vs 2025

This percentage split is unchanged from last year's report.

The split between centralized and decentralized data models remains exactly where it stood last year.

Most MNEs (almost 3 quarters) are still entrenched in fragmented data environments which typically means more manual process, uncertain data sources, inconsistent data quality, higher risk of documentation errors and less of an ability to respond swiftly to audits. As regulatory pressure intensifies, the persistence of decentralized models could become a bottleneck for both compliance and scale.

Structured Data Use in TP Processes



Structured data usage across Tax and TP functions remains limited

While over 60% of respondents report at least moderate use, just 14% have fully embedded structured data into their workflows. What's striking is the gap between this figure and the 28% of respondents operating with centralized system (as reported in, 'Data Management Models: Centralized vs Decentralized').

This suggests that **centralization alone isn't sufficient**; a single source or system may store the data, **but it doesn't guarantee structured, usable outputs**.

Other factors clearly influence maturity:

- Collaboration between Tax, Finance and IT
- Clarity around data ownership
- Standardized Data Structure
- Purpose-built tooling

All these shape whether teams can actually harness structured TP data in practice. Without these, even centralized environments risk becoming just cleaner versions of fragmented ones.

The takeaway is clear: **real transformation happens when technology, people, and governance align around data as a strategic asset.**



Expert Insight

"Structured, reliable data is essential for executing a consistent, defensible transfer pricing strategy. However, many companies still rely on fragmented data sources and manual interventions, which create inefficiencies and increase compliance risks. Common barriers include siloed legacy source systems, unclear data ownership, and inconsistent definitions across entities and functions.

The sustainable way to lift an organization out of this, is to consolidate data on a purpose-built Platform, creating a single source of truth for all TP-related data, both structured and unstructured.

In this way organizations can shift their focus from data wrangling to process optimization. With a centralized data foundation, teams can collaborate more effectively across Finance, Tax, and Operations, and support the full TP lifecycle, from strategic planning through to documentation and audit defense."

Maria Helander

VP Product

Aibidia



DATA IN TRANSFER PRICING

Key Takeaways

Centralization ≠ maturity

28% of groups have centralized TP data, yet not all of these report heavy or even moderate structured-data use.

Structured data is still scarce

Just 14% of respondents heavily utilize structured TP data; most remain in the moderate-to-minimal range.

Governance bridges the gap

It can be argued therefore, progress depends on cross-functional ownership, shared taxonomies and the right tooling; without these, centralized systems deliver limited benefit.

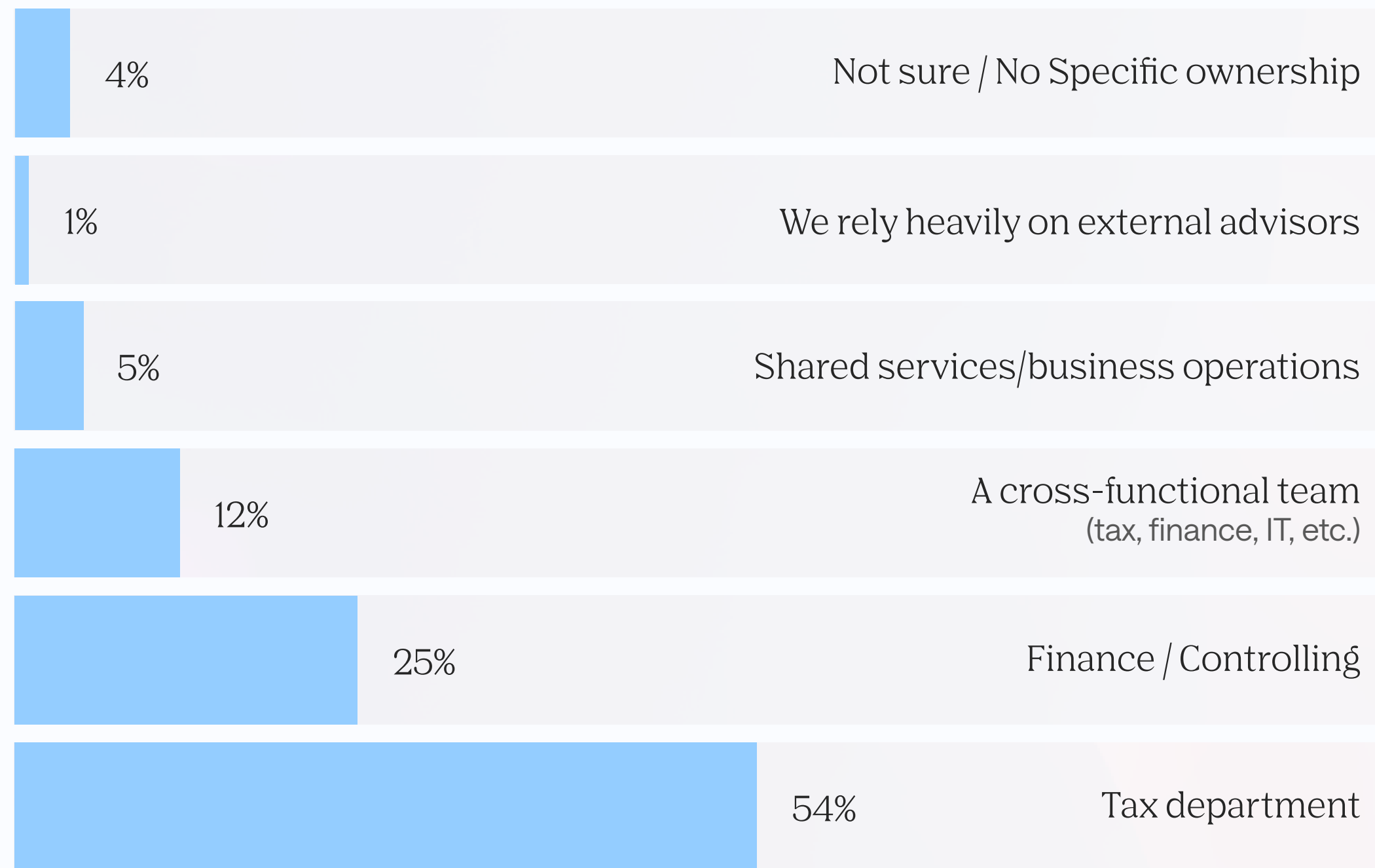
Operational Transfer Pricing

OTP progress plateaus as execution struggles to scale

Operational Transfer Pricing (OTP) is where policy meets execution. This year's results confirm OTP is now a core process for most organizations, but how it's delivered varies widely. Capability gaps in tooling, automation, and operational clarity hold back its full potential.

Who Owns OTP?

Which department or function within your company holds primary responsibility for overseeing OTP?



Most MNEs still place ownership of Operational Transfer Pricing squarely within the Tax department. At 54%, this reflects the view of OTP as a tax-anchored process despite its increasing operational overlap with finance.

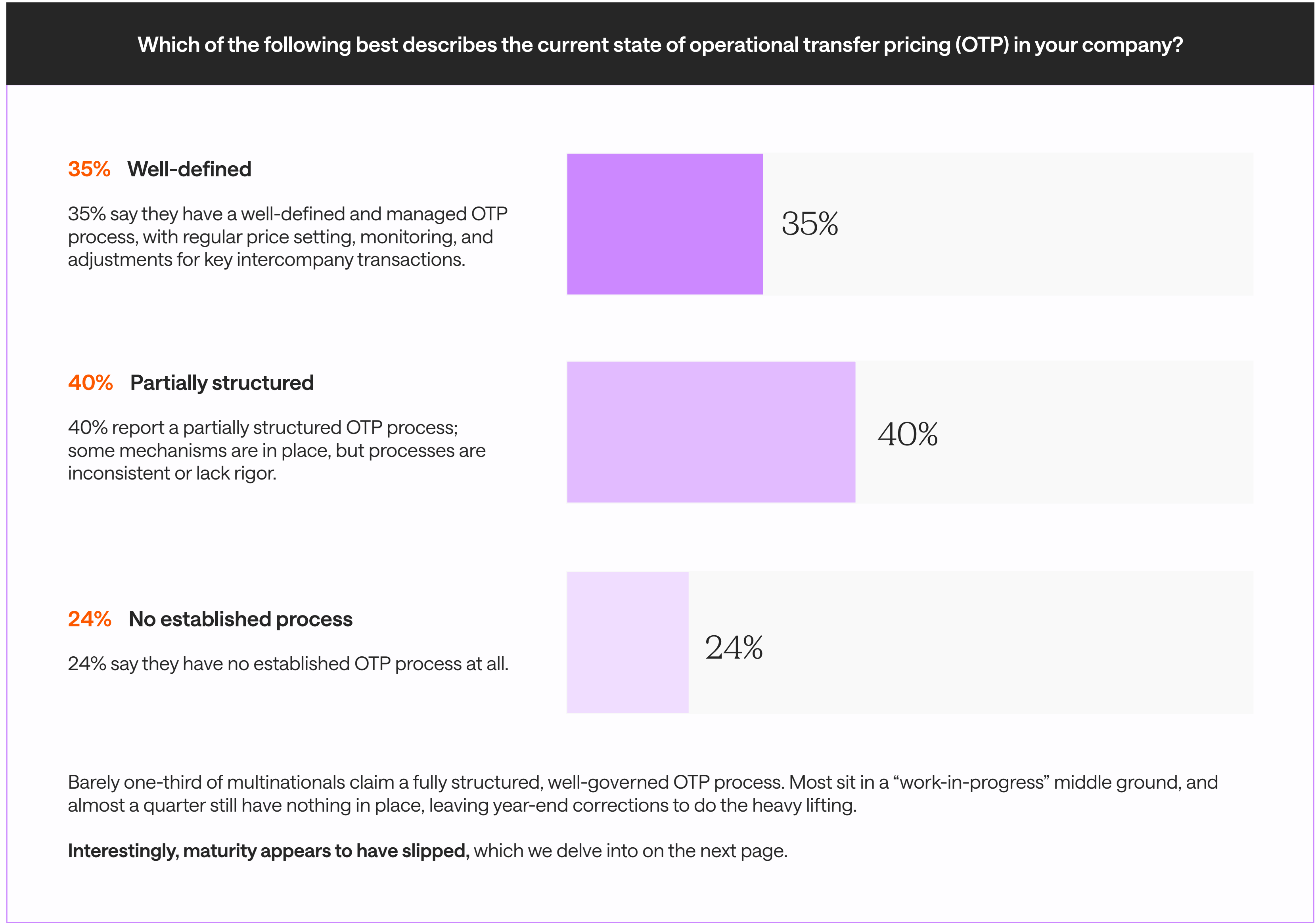
Finance and Controlling teams represent the second-largest group at 25%, suggesting growing alignment with forecasting and close processes, especially in more mature setups.

Interestingly, only 12% of respondents report cross-functional ownership, even though OTP by its nature spans policy, actuals, and systems. This limited cross-functional governance may explain why many OTP processes still struggle with fragmentation and inefficiency.

Shared services models and heavy advisor reliance remain niche.

Ultimately, the data points to a continuing gap between how OTP is structured and how it functions - with **ownership still too siloed for a process that demands integration.**

How Mature are OTP Practices Today?



Expert Insight

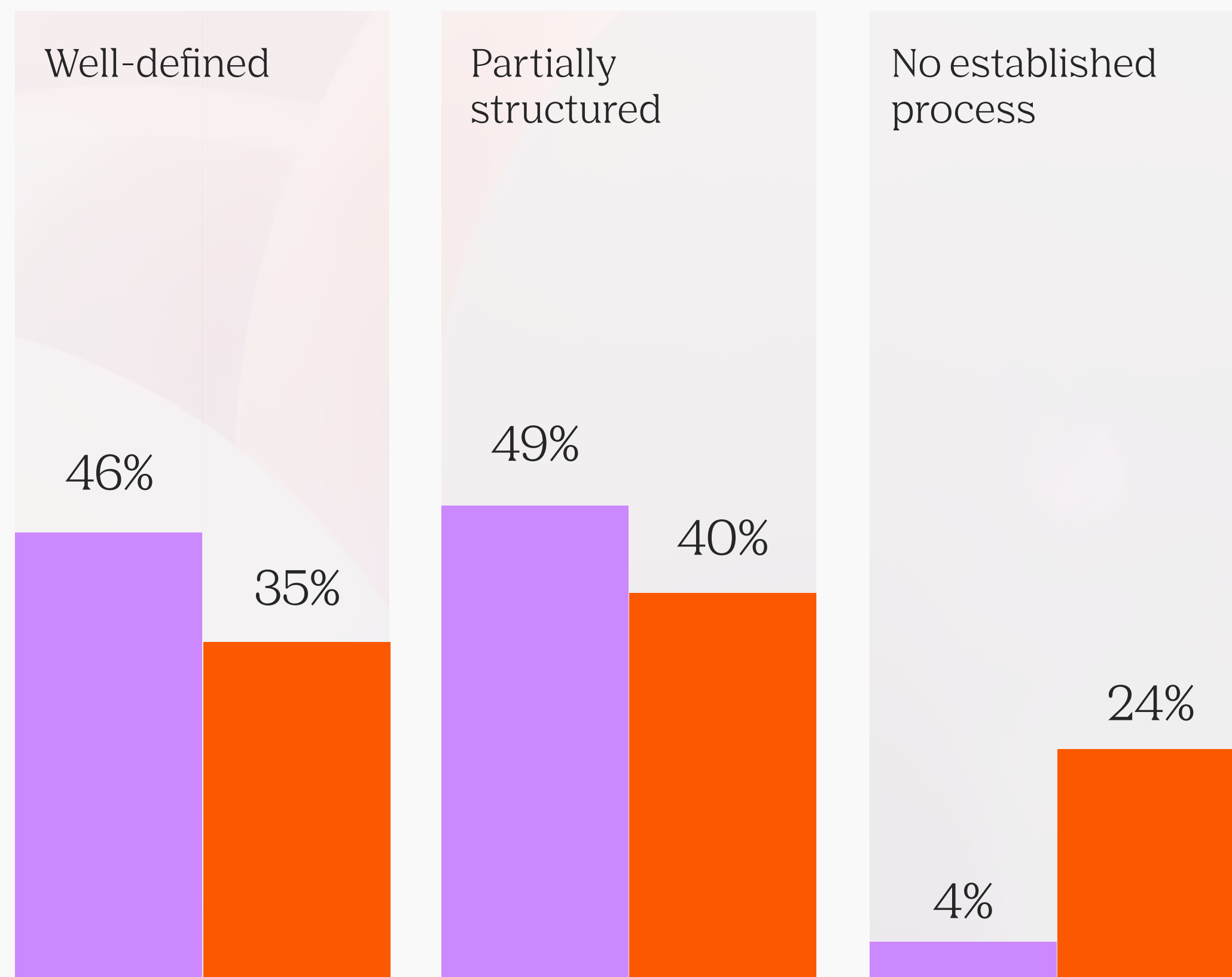
"There is growing emphasis on the efficient and accurate implementation of transfer pricing arrangements, for tax planning, operational monitoring, financial reporting, compliance, and audits.

This trend is accelerating the need for more mature operational TP practices, built on defined processes and close collaboration across tax, accounting, IT, and supply chain functions. Technology serves as a critical enabler in achieving these goals by enhancing both efficiency and accuracy."

Prasad Pardiwala
Head of Professional Services
Aibidia



Which of the following best describes the current state of operational transfer pricing (OTP) in your company?



2024 2025

At first glance OTP maturity seems to have gone **backwards significantly** year-on-year. Three theories that may have combined to create this drop:

Resource allocation

TP teams have been pulled into high-priority projects like Pillar Two implementation & responding to a growing level of tax authority scrutiny (see section, 'Navigating Audits and Tax Authority Scrutiny').

Stricter self-assessment

As OTP expectations mature, practices once viewed as "structured" may now be recognized internally as falling short, resulting in more honest or critical reporting.

Execution complexity is growing

As intercompany models become more dynamic and transactional volumes increase, previously adequate OTP setups may have been outgrown leaving teams unable to scale or adapt without significant reinvestment or reengineering of process.

It's our sense that dip in maturity is less a sign of neglect and more a signal that **existing processes are being stress-tested (and often found wanting)** in a more demanding compliance and operational environment.



"We see significant variation in OTP maturity across companies. In many cases, if existing processes appear to work, even if built on legacy tools like Excel, there's less motivation to change.

However, where we see this change, is within companies that have faced audit scrutiny or operate with more complex structures; they tend to be further along in their OTP journey. Within these MNEs, the more mature OTP teams focus on refining price setting and forecasting, while those at earlier stages are primarily concerned with monitoring and gaining visibility into their transactions."

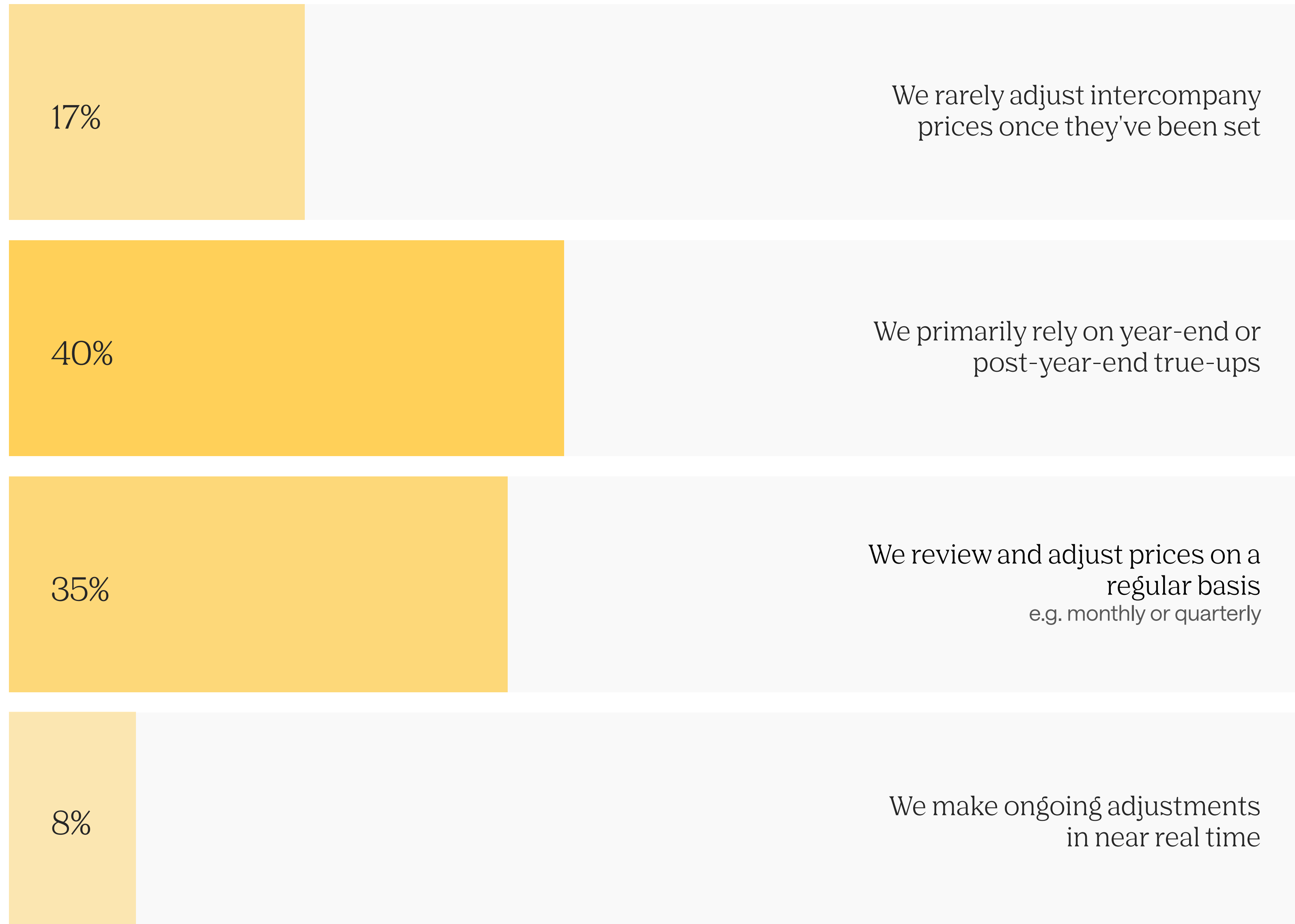
Pia Honkala

Global Commercial Head -
Operational Transfer Pricing

Aibidia



Which statement best describes how you align transfer pricing policies with actual business transactions throughout the year?



The adjustment patterns help bring the OTP maturity picture into sharper focus.

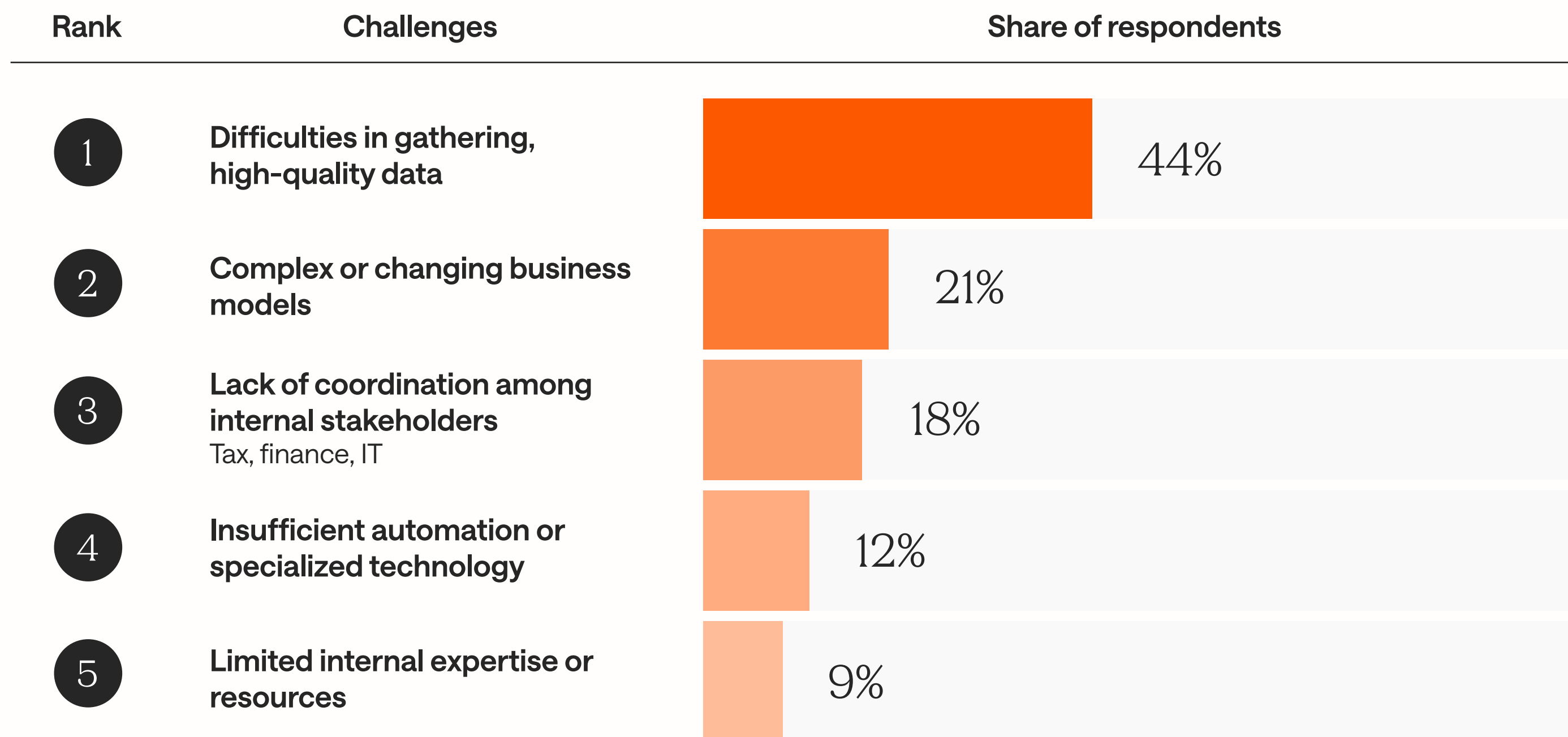
Only 35% of respondents make monthly or quarterly pricing adjustments, mirroring the 35% who reported having a well-defined OTP process.

Meanwhile, 57% either adjust only at year-end or rarely revisit intercompany prices at all, aligning with the 64% whose processes are either only partially structured or entirely absent.

This correlation reinforces what the maturity data already signals: **for most companies, OTP is in its infancy**, not well-established, embedded process.

What's holding OTP Maturity Back?

What are the most significant challenges your organization faces in implementing OTP processes?



Data remains the single biggest brake on OTP maturity: almost half of all companies struggle to pull steadfast, clean, timely information into the process. The second and third-ranked blockers (complex business models and weak cross-functional coordination) underscore why the data problem is so hard to solve: as transaction flows evolve, siloed teams and legacy systems can't keep up.

Technology and skills gaps round out the list, but at noticeably lower levels; this suggests that even where tools or talent are available, they only deliver full value when foundational data and collaboration issues are addressed. In short, **OTP maturity is constrained less by the idea of automation and more by the raw material (reliable data) and the organizational glue needed to use it effectively.**

Plus, technology and talent gaps also play a role. A combined 21% of respondents cite limited automation or internal expertise as barriers. These responses suggest that while tooling may be available in principle, putting it into practice still requires deeper investment in system integration, user capability, and internal process readiness.



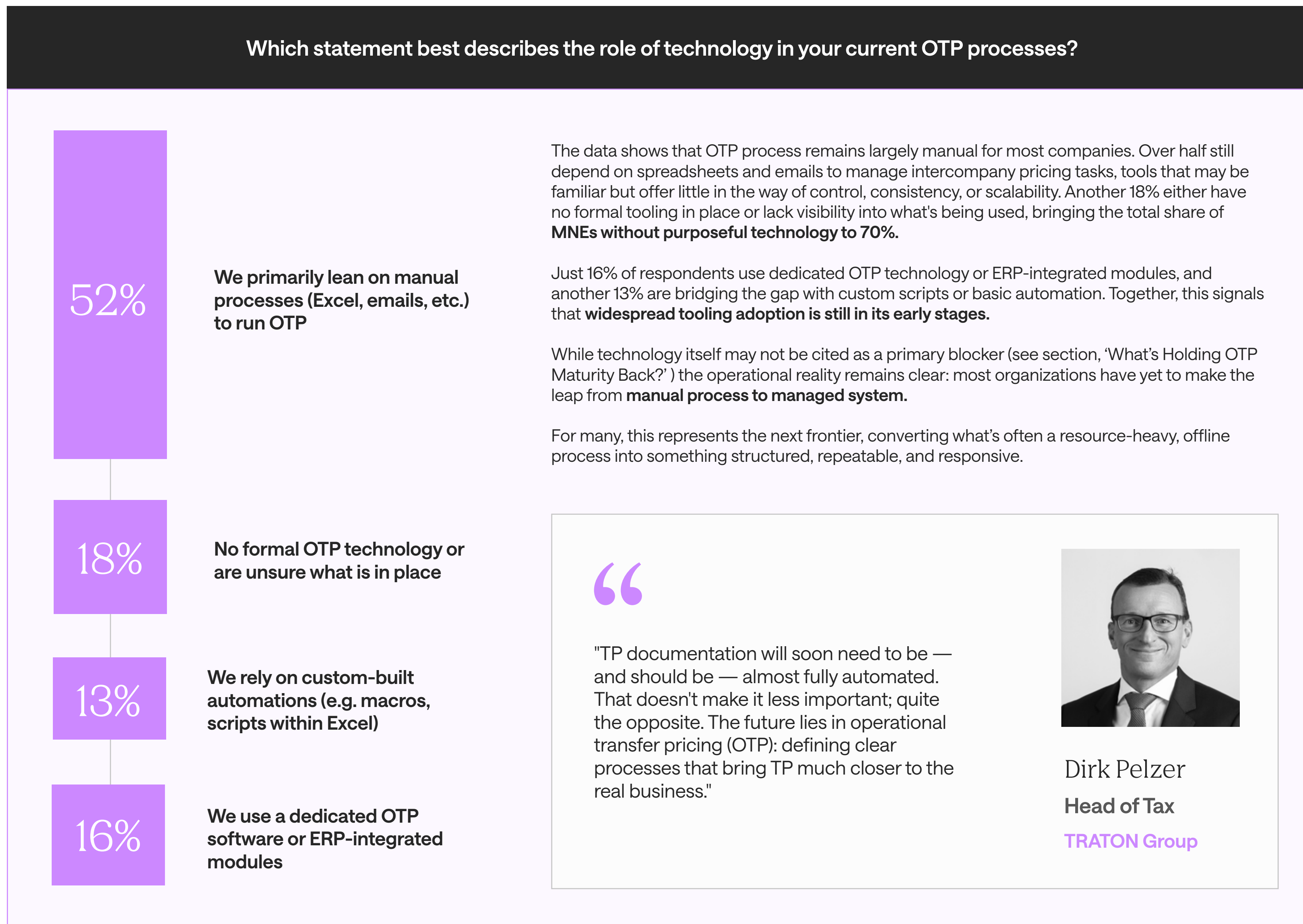
“Two clear success factors stand out: first, a positive attitude toward change recognizing that processes must evolve over time; and second, strong collaboration between tax and finance. While technology can accelerate and simplify operations, its true impact depends on these foundational elements. Without them, even the best tools may fall short of delivering their full potential.”

Pia Honkala
Global Commercial Head - Operational Transfer Pricing

Aibidia



Technology’s Role in OTP – Still Early in the Curve



OPERATIONAL TRANSFER PRICING (OTP)

Key Takeaways

Maturity is stalling

Fewer companies now report having a well-defined OTP process compared to last year, and one in four have no structured process at all suggesting that **rising complexity is outpacing internal capabilities**.

Execution reveals the gap

Most MNEs still rely on year-end true-ups or infrequent adjustments, confirming that limited structure and low maturity translates into reactive, rather than proactive, execution.

Technology adoption lags behind ambition

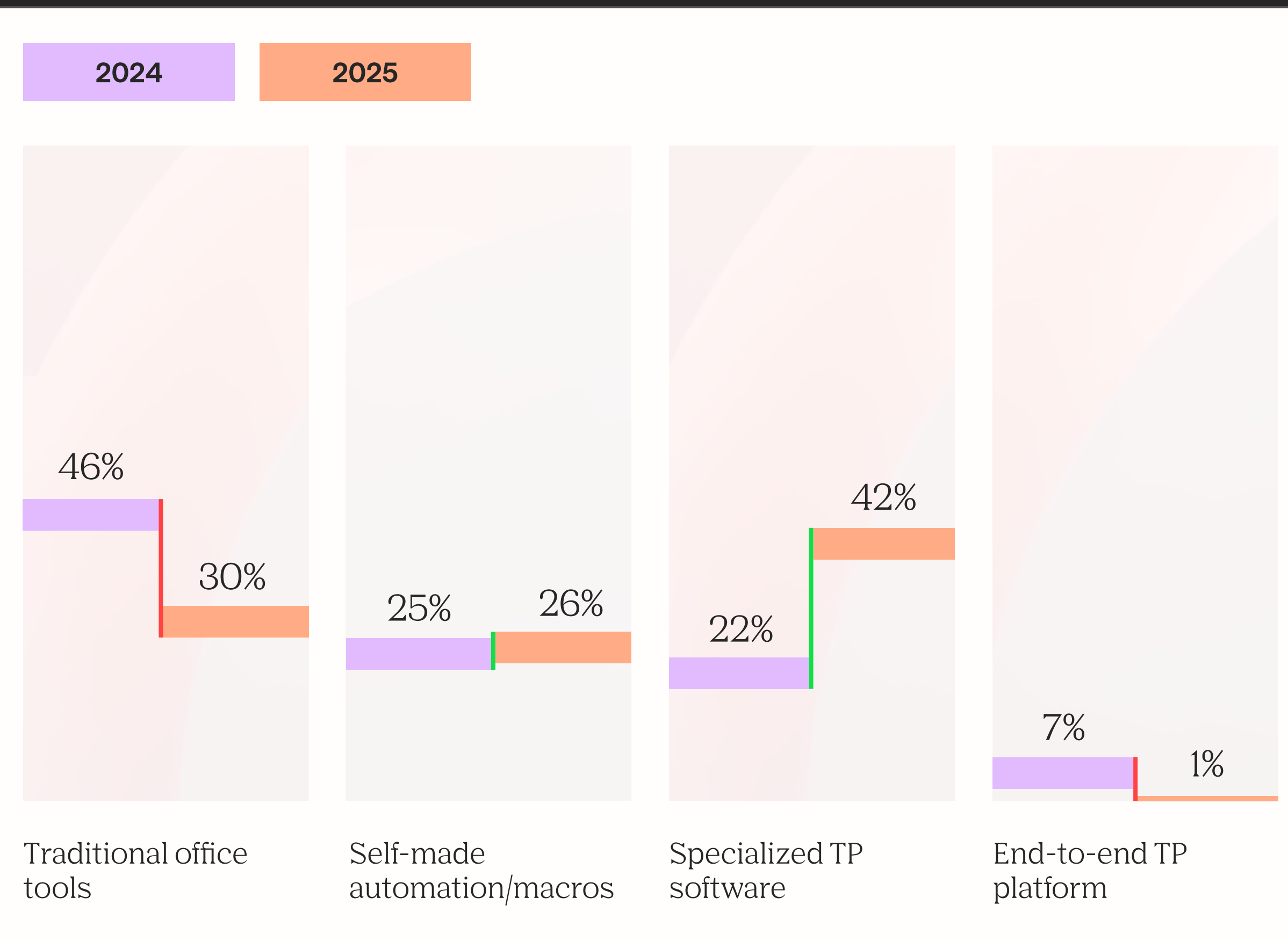
Despite rising awareness, the majority of OTP processes remain manual. Just 16% use dedicated or ERP-integrated software, pointing to a clear opportunity for transformation through targeted tooling.

Adoption of Technology

From Spreadsheets to Specialist Software

Transfer pricing teams are moving away from basic office tools. Excel remains the single most common tool, yet specialist TP software has doubled its foothold in a year. Most teams are now either actively exploring new tools or weighing cost-benefit cases.

Which statement best describes the tools and technologies you use in transfer pricing processes?



- 30%** still rely on traditional tools (Excel, email) for most TP work, down from 46% in 2024.
- 26%** use self-made automation such as macros or scripts.
- 42%** have adopted specialised TP software, a jump of 20 percentage points year-on-year.
- 1%** run on an end-to-end TP platform.

The data shows a clear shift away from reliance on traditional tools: reliance on Excel and email dropped from 46% to 30% since 2024's edition of this report, while adoption of specialist TP software rose sharply to 42%.

This momentum could reflect mounting regulatory pressures, particularly Pillar Two and increased audit activity, which has pushed teams to seek more scalable, audit-ready solutions. While the use of specialist software is rising, **end-to-end TP platforms remain a small minority**, representing just 1% of respondents.

This likely reflects a broader preference for fit-for-purpose tools that can be deployed faster and with less disruption. Full-suite implementations often require multi-year timelines, extensive ERP integration, and more robust change management - barriers that many organizations, especially under current budget and bandwidth constraints, are choosing to avoid.

As a result, the trend is toward **incremental, use-case-led adoption**, rather than all-in platform transformation.



"Technology is the foundation of transformation, enabling transfer pricing teams to achieve greater accuracy, efficiency, and strategic insights."

Takanori Funatsu
Global Tax Manager
OLYMPUS



Expert Insight

“As tax authorities increase scrutiny of transfer pricing arrangements, in-house teams are facing growing pressure to produce comprehensive documentation, ensure defensibility, and maintain high-quality data. In response, many are shifting from a reactive, compliance-only approach toward more proactive risk management and strategic involvement.

Technology plays a key role in this transition. Not only by helping teams manage compliance and operational processes more efficiently, but also by enabling better data analysis for risk identification and resource planning. When effectively implemented, these tools allow TP professionals to shift focus from manual tasks to higher-value strategic activities.”



Prasad Parwidala

Head of Professional Services

AIBIDIA

Bonus Content: How Technology Choice Shapes Confidence with Tighter Data Rules

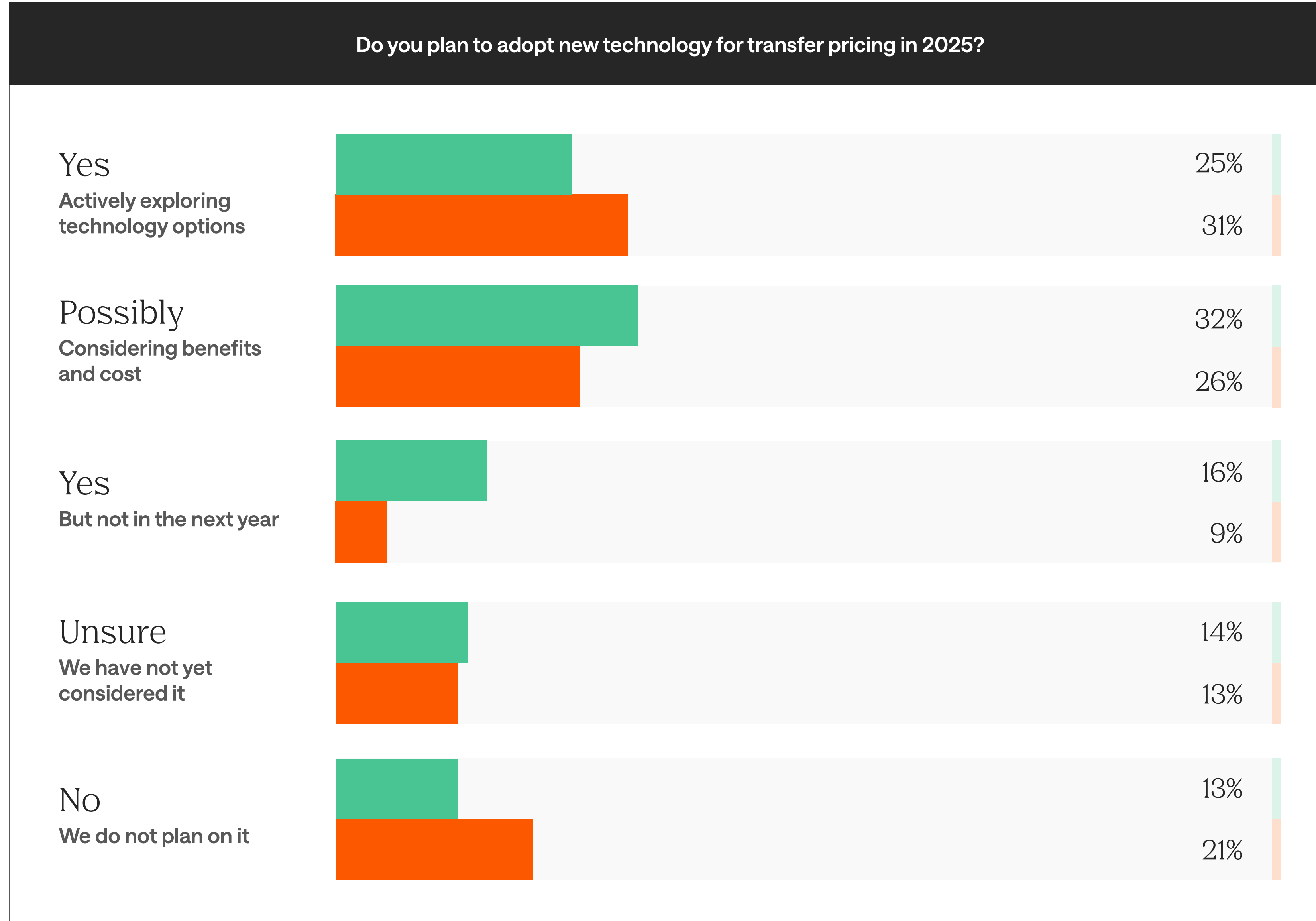


While the 100% confidence rate among **end-to-end platform** users stands out, it's important to note that this group remains a **small minority** in our overall sample (1%). Their responses suggest that integrated platforms are delivering the structured, traceable data flows needed to withstand heightened regulatory scrutiny, but this view reflects a niche segment, not the norm.

More revealing is the contrast between users of **specialist TP tools** and those relying on **self-built automation**. Among TP software users, the **majority anticipate only moderate tweaks**, with relatively low levels of uncertainty (9%). In comparison, **30% of teams using custom-built tools are unsure** how tighter rules will affect them, more than triple the uncertainty rate of those with vendor-built software.

This gap underscores a key tension: while both groups have moved beyond purely manual methods, **off-the-shelf solutions appear to offer clearer paths forward**, whereas **home-grown systems may lack the clarity, documentation, or confidence needed under stricter regimes**. In essence, this data highlights that **uncertainty (not just capability) is emerging** as a differentiator in OTP readiness.

Future Adoption Plans



A majority of teams are either shopping for solutions or building a business case, signaling broad recognition that manual methods are unsustainable.

The shrinking “deferred” segment (16%-9%) shows some MNEs are moving off the fence and into exploration or active decision making.

However, the rise in the “no plans” group (13%-21%) could reflect **organizations that made key investments** in 2024 and are not currently pursuing further tooling. Others may be satisfied with incremental fixes or simply taking a wait-and-see approach.

Either way, the steady growth (+16%) in those actively seeking technology suggests that momentum is building, with more teams moving from discussion to delivery.



Primary Technology Goals

What is your primary goal with technology adoption for 2025?

10%

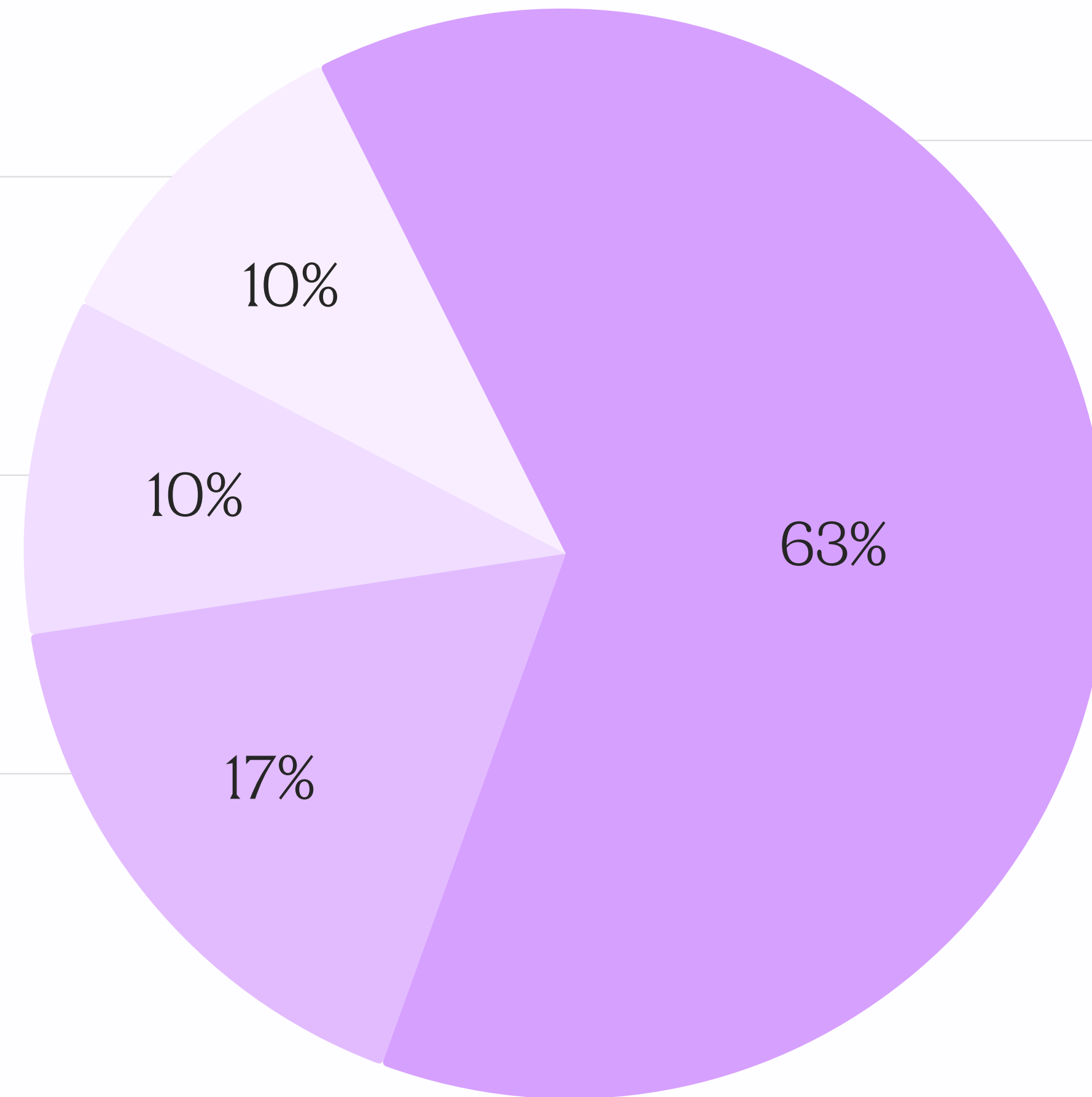
Prioritize **AI-driven analytics**.

10%

Cite **dashboards or workflow enhancements** as other goals.

17%

Seek **comprehensive TP-suite integration**.



63%

Aim to **automate data and documentation** flows.

The emphasis on automation aligns with pain-points surfaced elsewhere in the report - timely data and resource strain. Full-suite integration appears secondary, perhaps reflecting staged adoption strategies.

Interest in AI is steady rather than explosive, hinting that many teams first need clean, structured data before advanced analytics can add value.

“

"Automation starts with a shared understanding. A clear understanding of where key transfer pricing data originates is essential to achieving accurate outcomes. Without properly identifying the relevant data points, generating reliable outputs becomes difficult.

While there are many challenges in accessing the right data for TP calculations and analysis, one of the most significant barriers to OTP adoption can be the misalignment of KPIs between Finance and Tax teams. Often, Finance is unsure of the level of detail Tax requires from ERP or financial systems, while Tax may not fully understand how transactions are recorded within those systems."

Marlon Manto

Director, Transfer Pricing
Advisory

AIBIDIA



ADOPTION OF TECHNOLOGY

Key Takeaways

Specialist TP tools gaining ground

Adoption of vendor-built software is up significantly YoY (+20%), though most teams still favor modular fixes over full-suite platforms.

Technology reduces uncertainty

Teams using specialist TP software are more certain about how stricter data documentation rules will impact their OTP processes, whereas users of self-built automation report far greater uncertainty suggesting tech maturity may help reduce ambiguity and support planning.

More TP teams are taking action

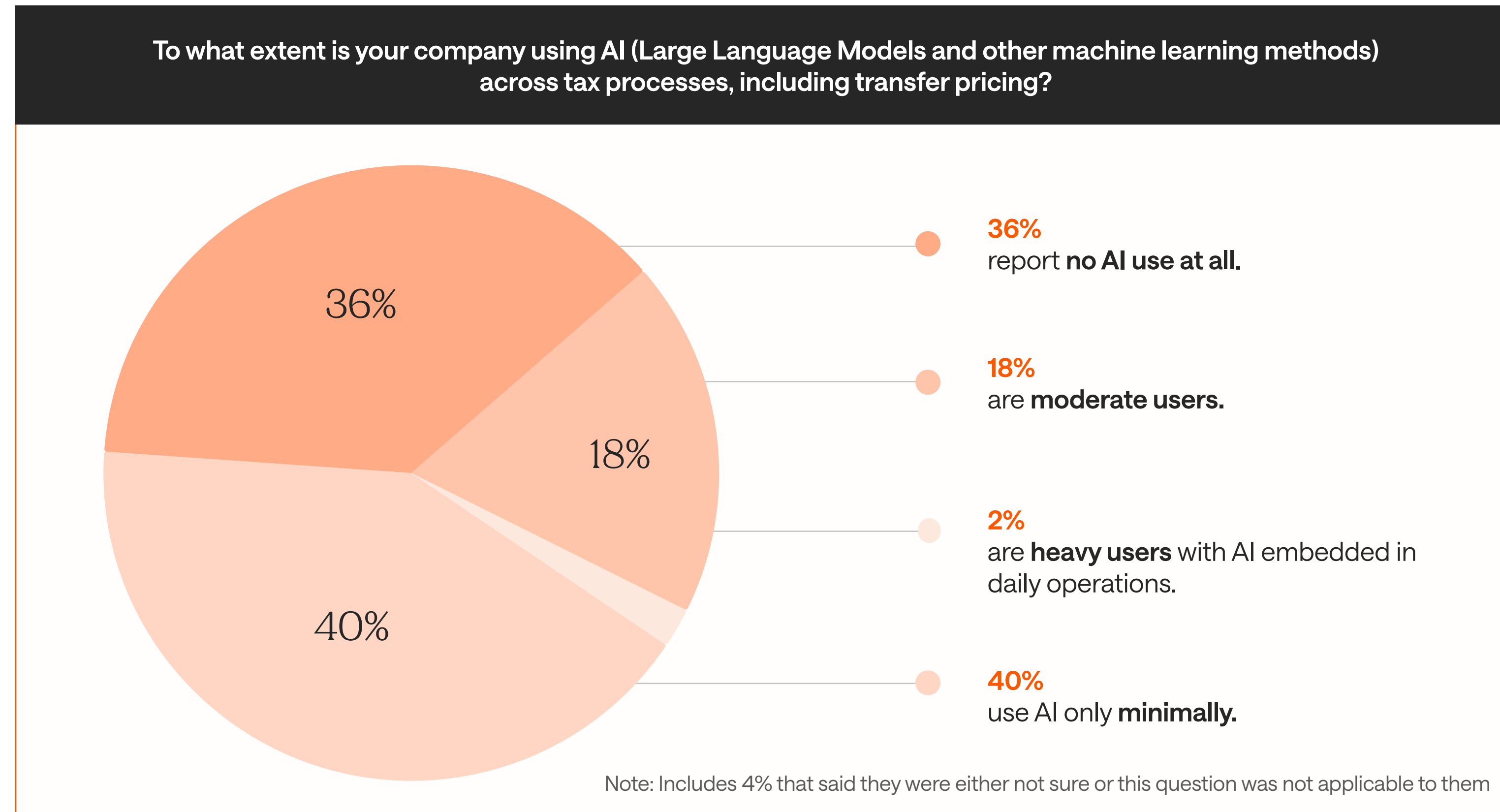
The share of TP teams actively exploring new technology rose from 25% to 31% year-on-year, indicating growing urgency to move beyond manual methods and start modernizing toolsets.

AI & LLMs in Transfer Pricing

Cautious steps into a data-hungry future

Interest in generative AI is unmistakable, but transfer pricing teams remain firmly in pilot mode. Most respondents are either experimenting at the margins or watching from the sidelines, held back by data-quality concerns and a shortage of purpose-built TP models.

How Widely is AI Used Today in TP?



AI adoption is still in its infancy. Only 2% of respondents report heavy AI usage across tax and TP processes, making deep adoption the rare exception. Most companies are just getting started; 40% describe their use as “minimal,” and 36% aren’t using AI at all. Moderate adoption is emerging, but slowly, with barely one-in-five respondents moving beyond light experimentation. This signals a cautious but growing interest in exploring the application of AI in tax and TP.

“

"As complexity rises, I see AI becoming a key tool for the future in this space, especially in transfer pricing, but also far beyond just the TP use case."



Dirk Pelzer
Head of Tax
TRATON Group

Appetite for ChatGPT and LLMs in 2025



Expert Insight

"Generative AI delivers the most value when it can draw on a broad foundation of structured internal data, unstructured content, and relevant external sources. With this context, models become far more capable of delivering practical, business-ready insights."

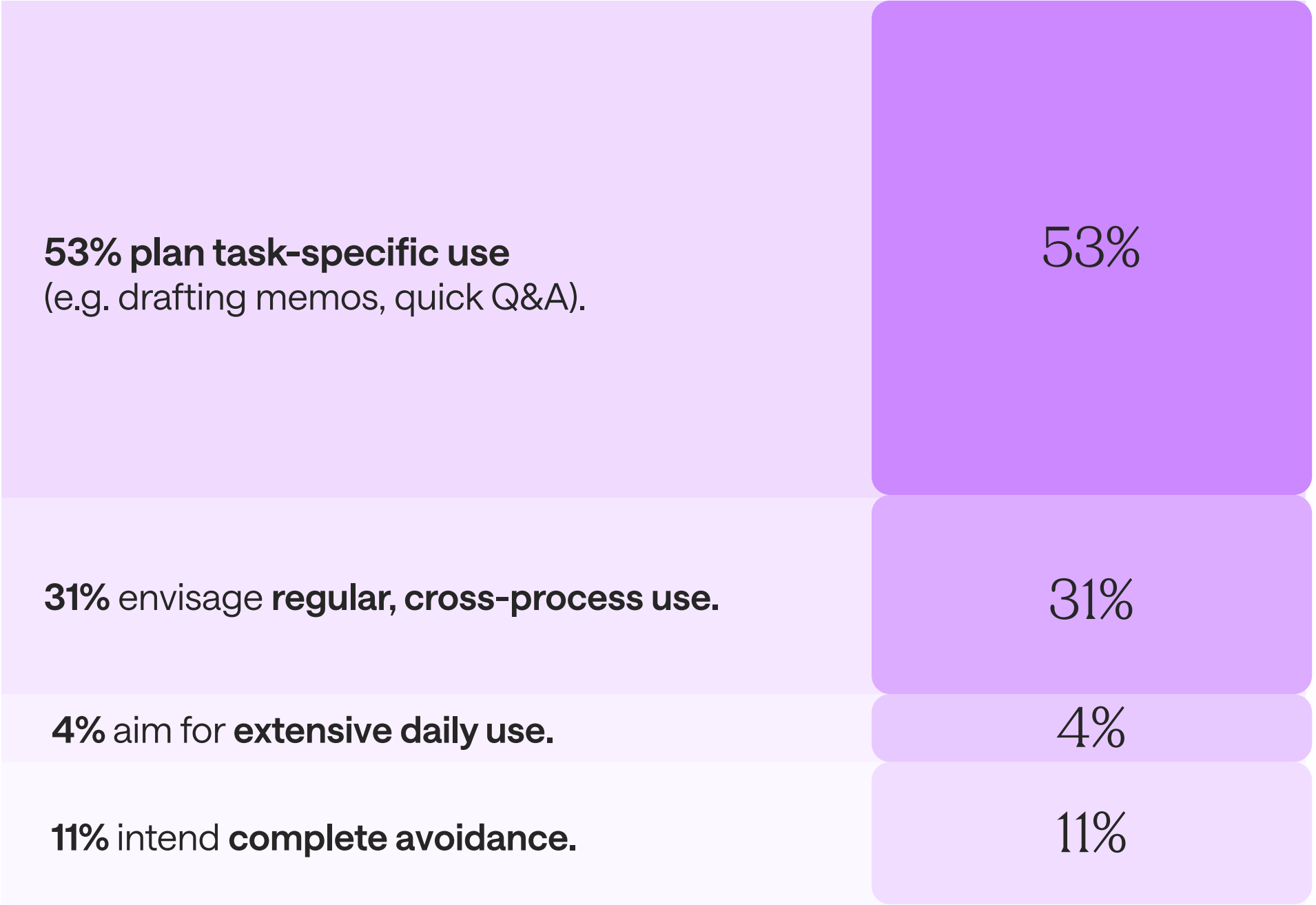
Maria Helander

VP Product

Aibidia



How extensively do you expect to use ChatGPT or other large language model solutions (LLMs) in your role in 2025?



Most TP teams (53%) aren't trying to overhaul everything with AI, they're expecting help with very specific, time-consuming tasks. Just under a third say they expect to use AI more regularly across multiple processes, but only 4% aim for deep, daily integration.

Meanwhile, 11% say they plan to avoid it entirely, perhaps due to concerns around data security or the reliability of outputs. The overall mood is curious but careful, focused on practical, low-risk applications.



Expert Insight

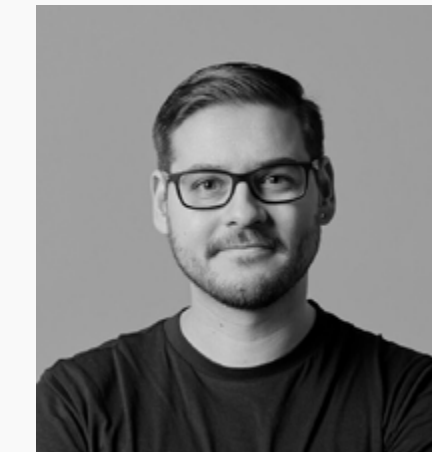
"Transfer pricing and tax functions tend to be conservative in their approach to technology adoption, and this caution is even more pronounced when it comes to AI. Multinational enterprises (MNEs) are actively seeking technology with embedded AI capabilities, but many remain hesitant due to concerns around data security and reliability.

A major barrier to effective AI deployment is data quality. Like any form of automation, AI systems depend on well-structured, up-to-date, and complete data. Without this foundation, even the most advanced AI solutions risk producing low-quality or unreliable outputs, reinforcing the adage: "garbage in, garbage out."

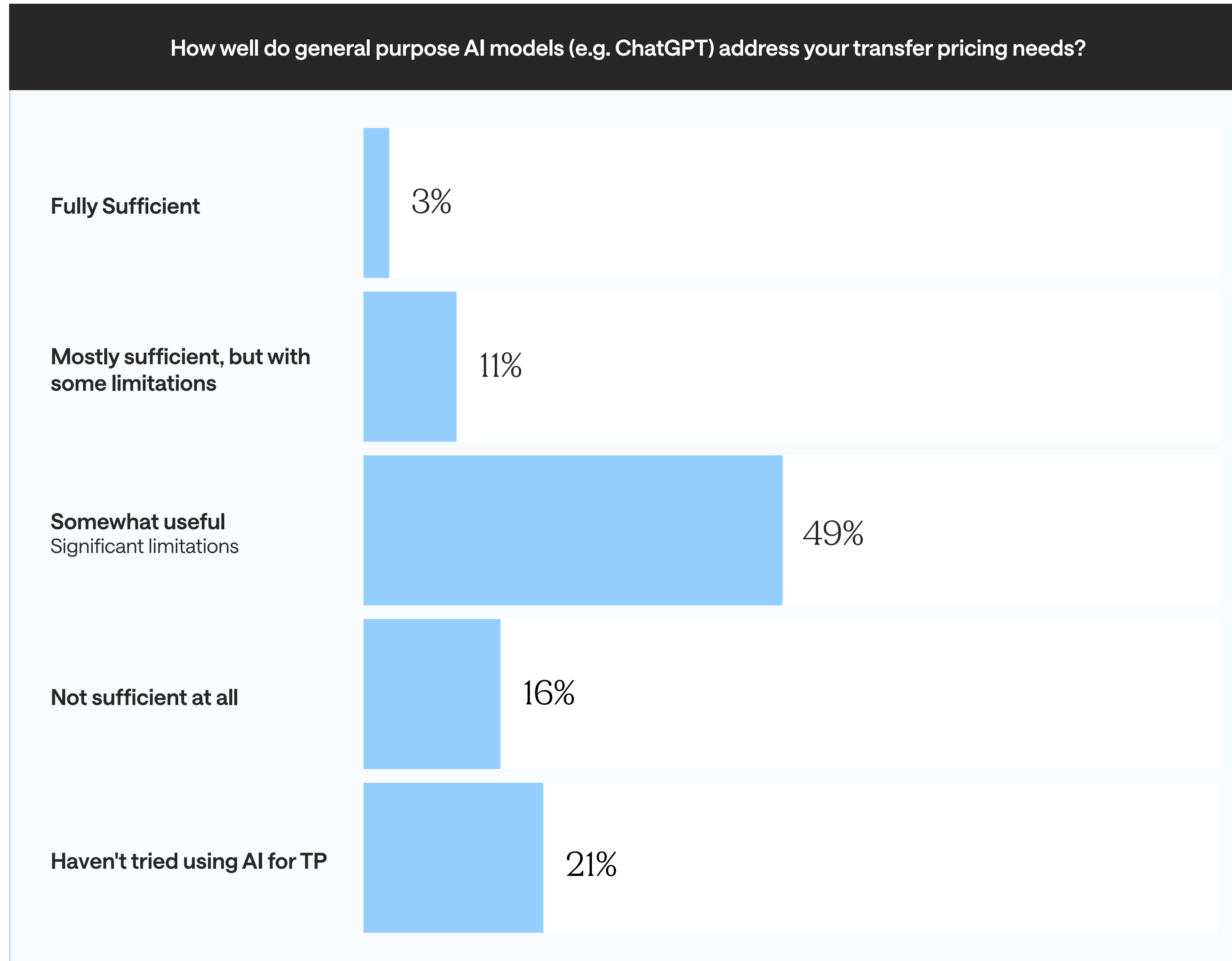
Tom Nuorivaara

Head of Product, AI & Head of Product Design

Aibidia



Do Generic LLMs Feel “Fit-For-Purpose”?



49%

Say that they are somewhat useful but limited.

16%

Find them not sufficient.

11%

Consider them mostly sufficient; 3% say fully sufficient.

21%

Have not tried them yet.

The majority of TP professionals see some value in generic LLMs, with 49% describing them as “somewhat useful but limited”.

However, only a small number see them as close to fit-for-purpose: just 11% say they’re mostly sufficient, and only 3% believe they’re fully sufficient. Meanwhile, 16% don’t find them sufficient at all, and 21% haven’t tried them yet.

This spread suggests that while LLMs are gaining attention, **most professionals still see clear gaps**, or haven’t had enough hands-on experience to judge.

“

"AI is showing promise in transfer pricing, especially when designed specifically for the needs of TP professionals. Tools developed with access to authoritative, regularly updated TP content — such as those built in collaboration with leading tax research institutions — are starting to offer capabilities that general-purpose models cannot.

We're seeing practical adoption in areas such as navigating country-specific documentation requirements, researching transfer pricing methods, comparing jurisdictional rules, and tracking global compliance timelines. These use cases are helping tax teams accelerate routine work, improve accuracy, and better prepare for audits."

Maria Helander

VP Product

AIBIDIA



AI & LLMS IN TRANSFER PRICING

Key Takeaways

AI adoption is still early-stage

76% of TP teams report no or only minimal use of AI, with just 2% saying it's embedded in daily operations.

Perceptions remain cautious and unformed

Nearly half of respondents find generic LLMs only somewhat useful, and one in five haven't tried them at all, highlighting that most teams are still in the early stages of evaluating if AI's fit for TP work.

Focus is on quick wins, not full automation

Over half of respondents plan to use AI for task-specific support (such as research, drafting or Q&A), rather than full-scale process replacement.

Navigating Audits and Tax Authority Scrutiny

The growing cost of compliance within a rising tide of pressure

Audit pressure continues to intensify. Transfer pricing audits are becoming more time-consuming, costly, and frequent. In 2025, companies report spending significantly more hours and money responding to audit demands than in the previous year, reflecting heightened scrutiny from tax authorities.

Audit Preparedness

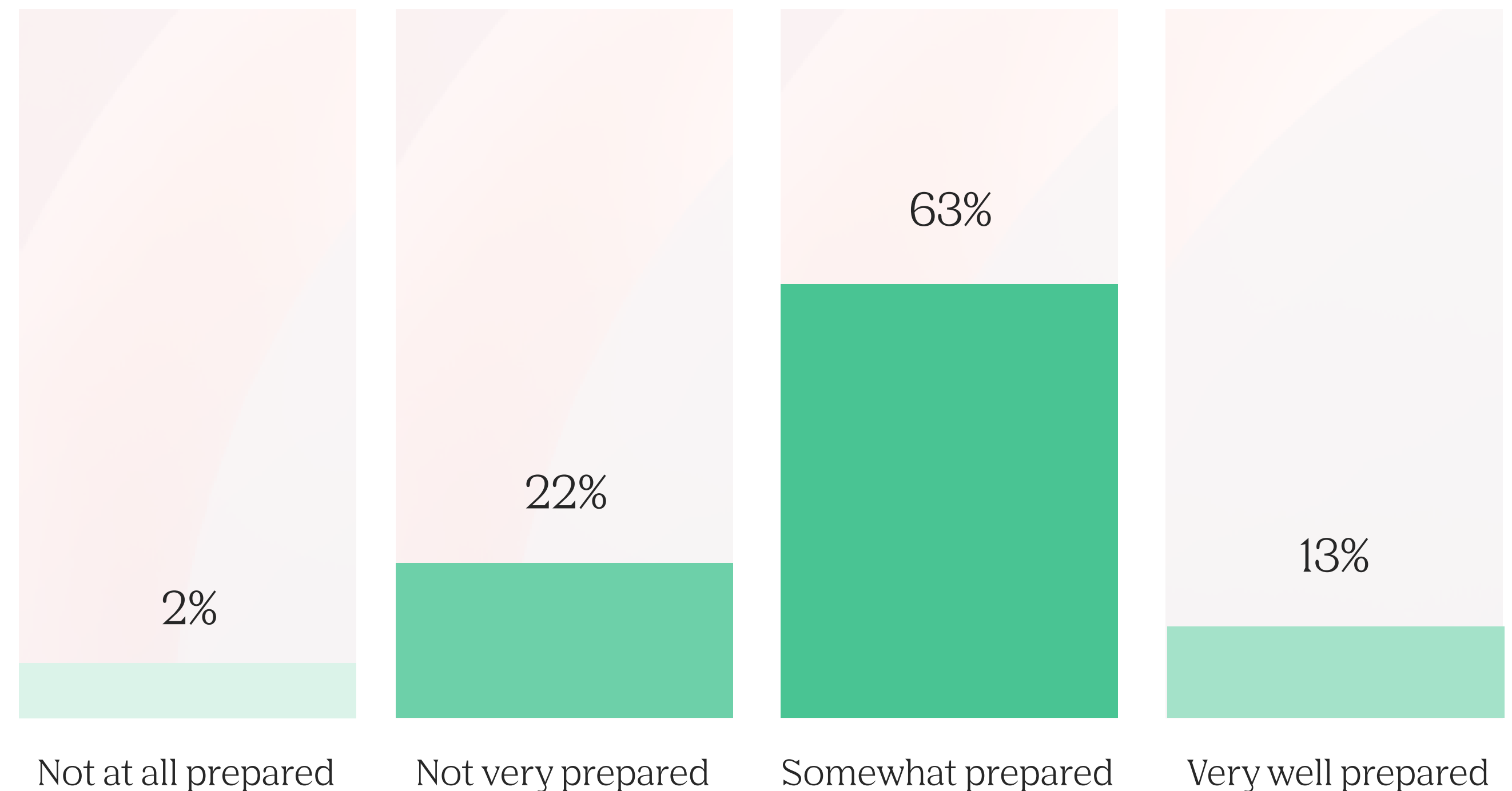
How prepared is your company for more rigorous auditing due to increased scrutiny from tax authorities?

Despite rising scrutiny, true confidence in audit readiness remains low.

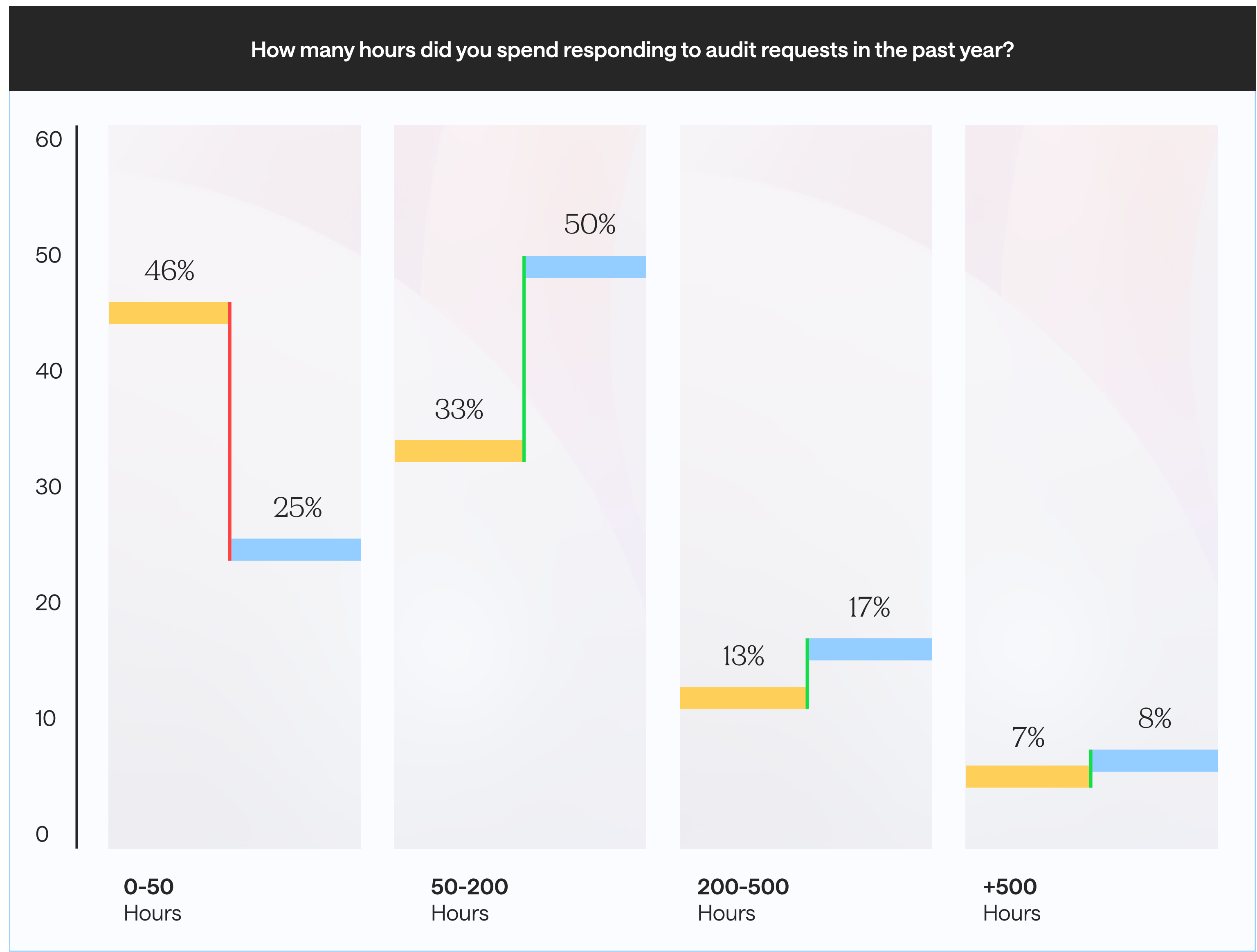
Just 13% of respondents say they're "very well prepared" to respond to audit requests, while nearly a quarter (22%) feel under prepared. **The majority (63%) land in the "somewhat prepared" category**, suggesting that while many tax teams are aware of the need to improve, few feel they've cracked it.

This middle-ground sentiment likely reflects partial progress: teams may have taken steps to standardize processes or improve access to documentation, but most likely still face challenges such as scattered data or manual workloads.

Ultimately, these results paint a picture of a tax landscape in transition, where readiness may be improving, but is far from complete.



Time Spent Responding to Audits (2024 vs 2025)



2024 **2025**

In 2024, 46% of respondents spent fewer than 50 hours on audit responses. In 2025, this fell to 25%.

The 50 to 200-hour bracket jumped from 33% to 50%.

Time spent in the 200 to 500-hour range rose from 13% to 17%.

Those spending over 500 hours remained consistent (7% in 2024, 8% in 2025).

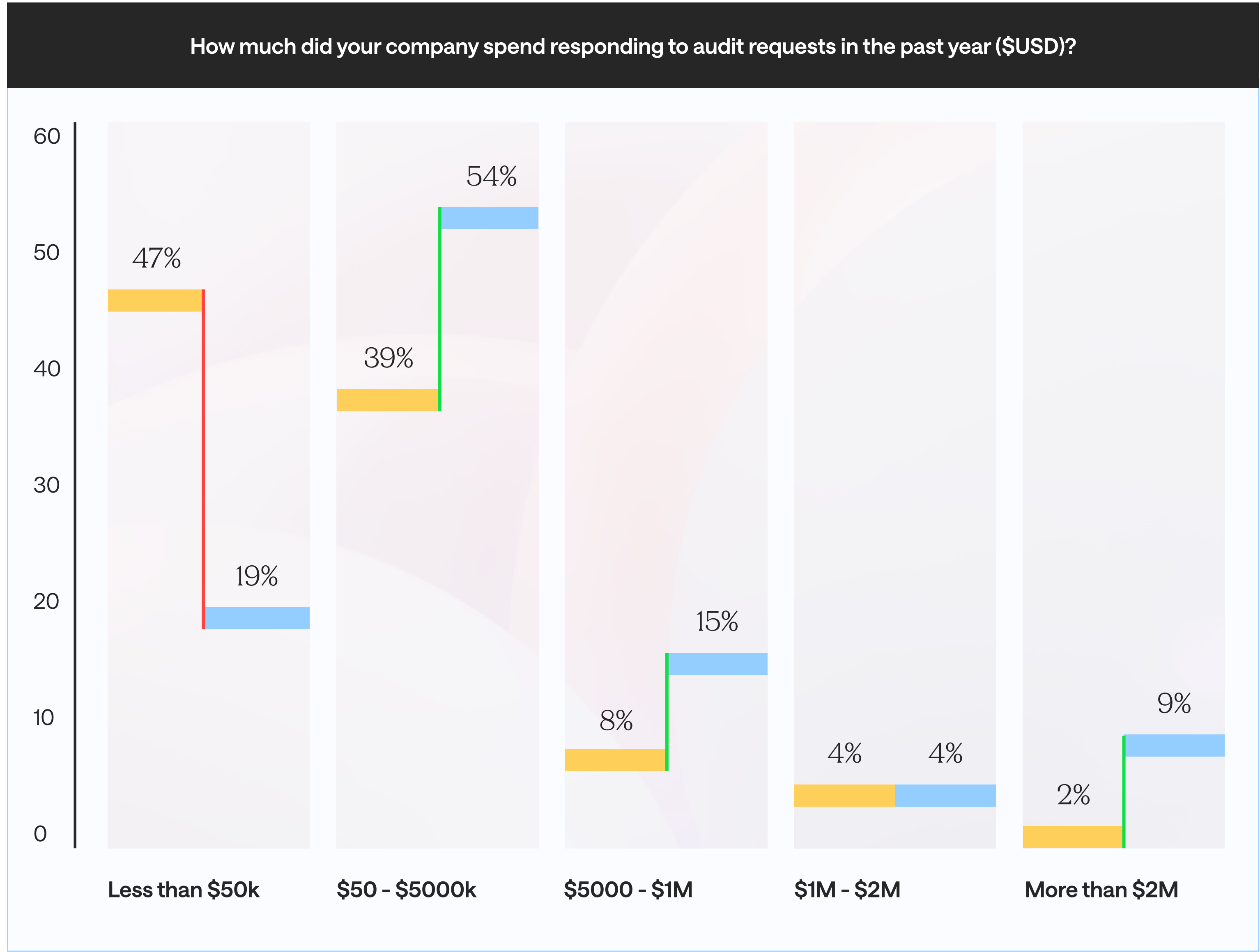
Audit response times are clearly on the rise. The share of companies spending fewer than 50 hours on audits has almost halved, while those falling into the 50 to 200-hour range have surged to become the new majority (33% to 50%).

Notably, the high-effort segment (200+ hours) is also expanding: 25% of teams now fall into this category, up from just 1 in 5 last year.

This suggests that more **MNEs are experiencing deeper or more data-intensive audits**, requiring broader coordination, more evidence-gathering, and greater internal effort.

As scrutiny grows, efficiency gaps in documentation and data access are compounding the time burden on TP teams.

Money Spent Responding to Audits (2024 vs 2025)



2024

2025

In 2024, 47% of respondents spent less than \$50k on audits. That fell to 19% in 2025.

The \$50k-\$500k range rose sharply from 39% to 54%.

The \$500k-\$1m range nearly doubled from 8% to 15%.

The share spending over \$2m rose from 2% to 9%.

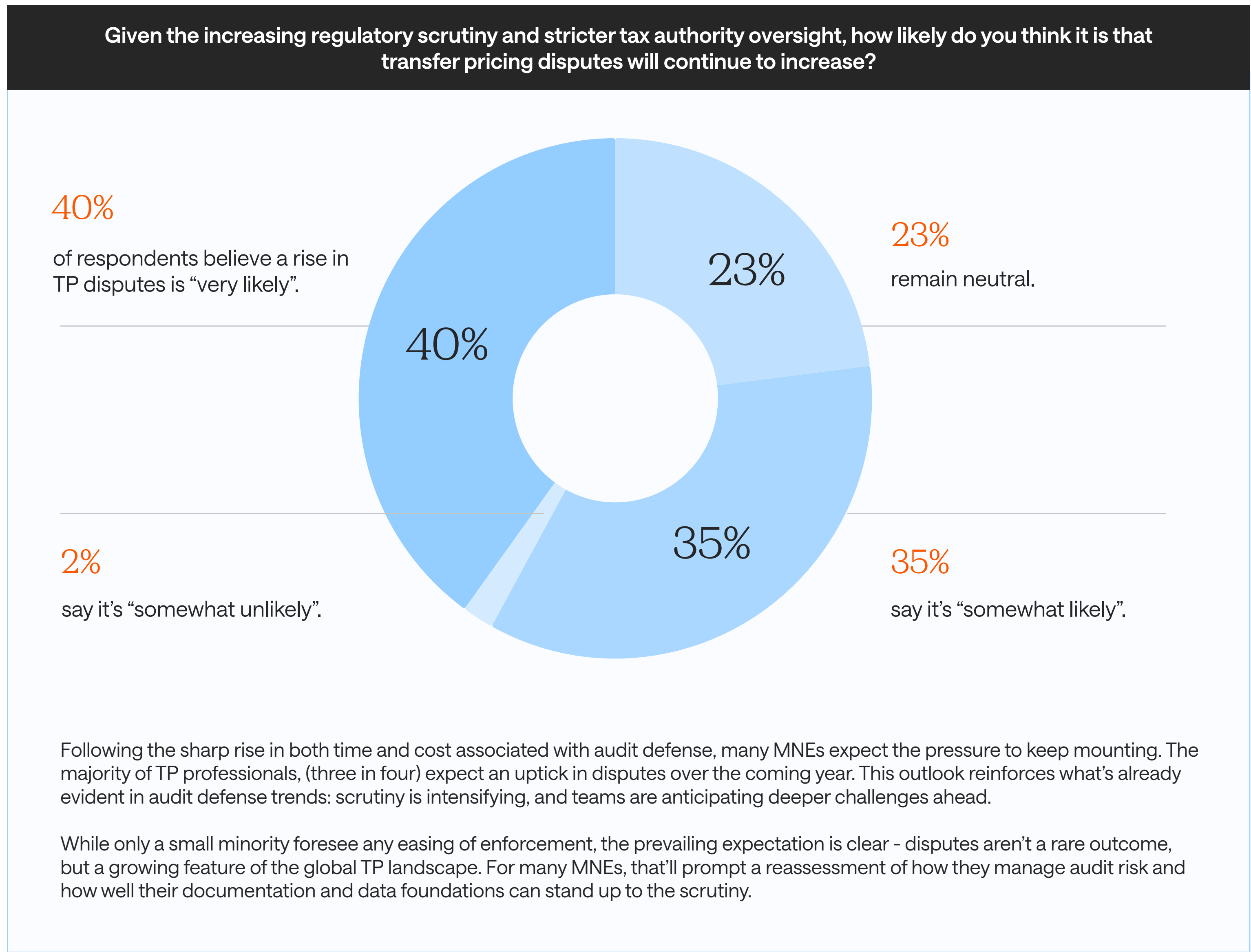
The financial cost of responding to audits is rising even faster than the time investment.

While the majority of companies previously stayed under the \$50k threshold, that group has shrunk dramatically, with most now spending between \$50k and \$500k.

Moreover, the increase in companies spending over \$1m on audit defence shows how quickly costs can scale when, perhaps for example, documentation is weak, or when jurisdictions pursue lengthy, data-heavy reviews.

These shifts underscore the growing importance of robust documentation, process and preparedness, not just as best practice, but as a way to contain cost exposure over time.

Disputes Anticipated to Increase



**NAVIGATING AUDITS AND TAX
AUTHORITY SCRUTINY**

Key Takeaways

Audit work is getting heavier, fast

The share of companies logging 50–200 audit hours jumped from one-third to one-half, and a quarter now spend 200+ hours. Costs followed suit: most firms have moved into the \$50k–\$500k bracket, and big-ticket audit spends (> \$1 m) are up sharply.

Readiness hasn’t caught up with risk

Only 13 % feel “very well prepared,” while nearly one in four say they’re under-prepared. The majority sit in “somewhat prepared” limbo, enough to cope for now, but vulnerable as audits become more data-intensive.

More disputes are on the way

Three-quarters of respondents expect TP disputes to rise. With time and money already trending upward, strengthening documentation and data processes is no longer optional, it’s become a practical lever for containing future audit exposure.

Top TP Priorities for The Coming Year

Balancing Risk, Compliance, and Transformation

In 2025, transfer pricing leaders are prioritizing resilience. Faced with growing audit pressure, evolving global rules, and increasing scrutiny on intercompany processes, MNEs are doubling down on core compliance areas such as strengthening audit defense & improving operational transfer pricing (OTP).

Top short-term priorities

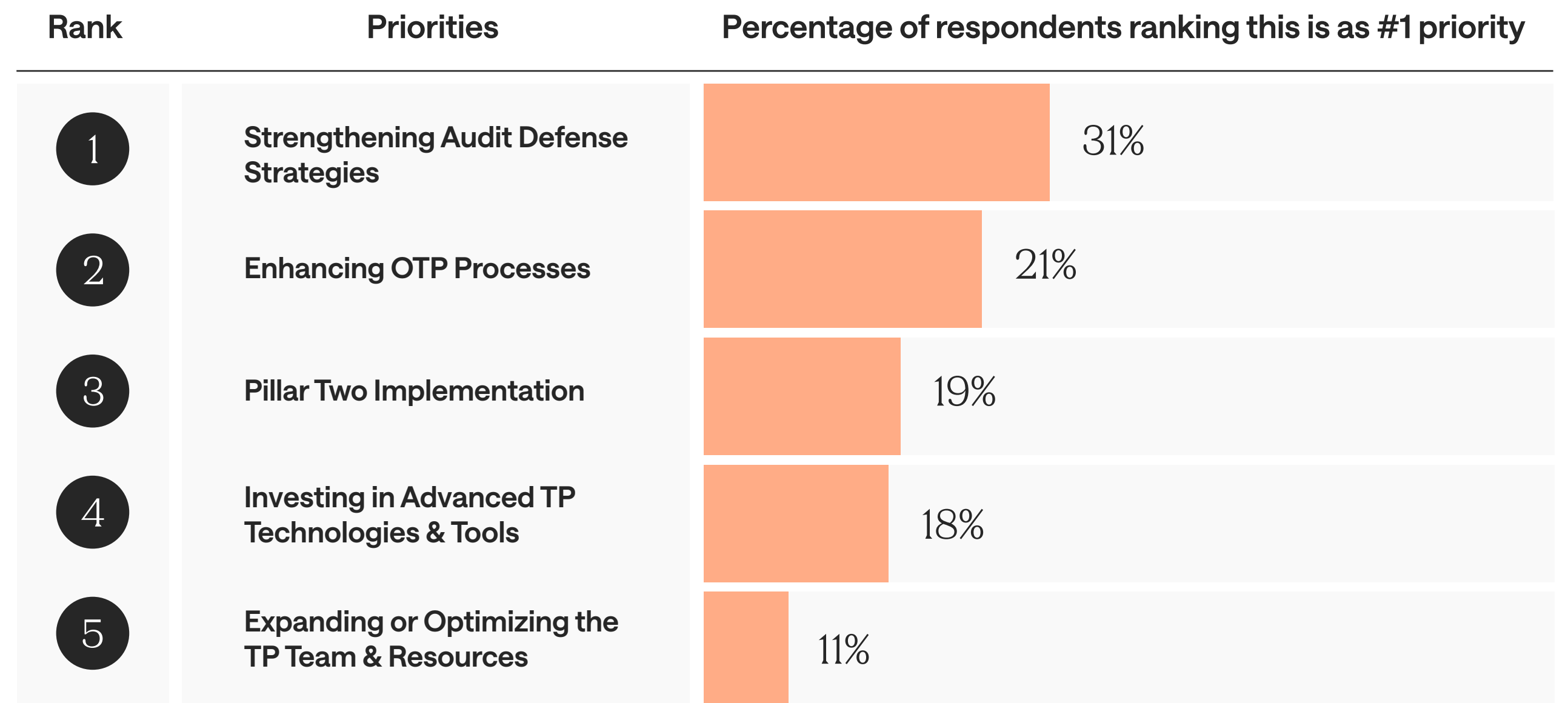
Looking ahead to 2025, please rank the following priorities in managing transfer pricing within your organization, with 1 being the most important

When forced to pick just one top priority, respondents placed clear emphasis on audit defense. With 31% ranking it highest, it's the undisputed short-term focus and likely a direct response to the rising time and financial cost of audit defense shown elsewhere in this report.

Notably, Operational Transfer Pricing (OTP) enhancements secured the second-highest top priority slot at 21%, showing that price setting, monitoring, and adjustment practices are climbing the agenda as scrutiny intensifies and businesses seek to embed compliance more deeply into day-to-day processes.

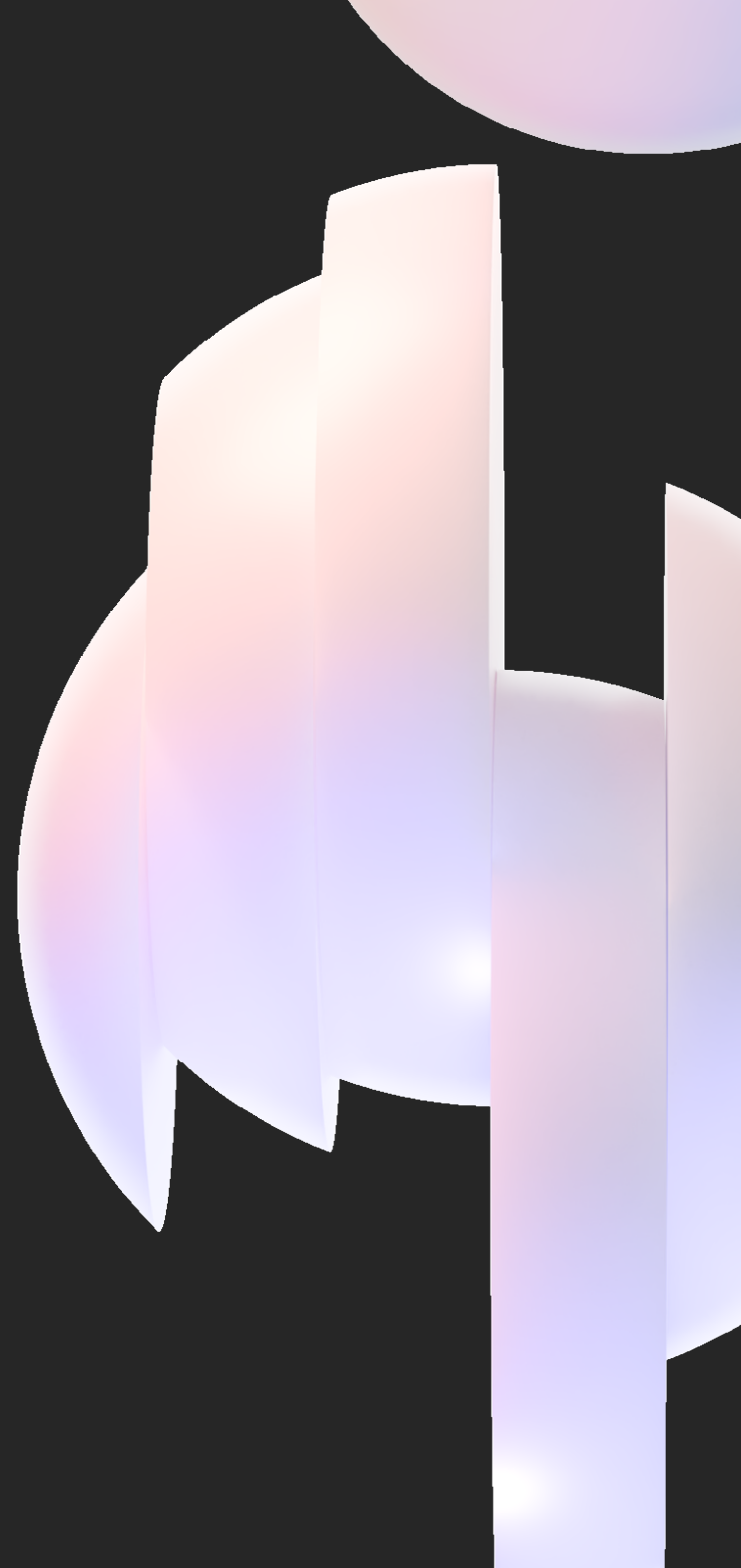
Pillar Two implementation is prominent, coming in 3rd with 19% despite the uncertainty concerning it.

Rounding out the list are investments in advanced TP technology (18%) and expanding TP team capacity (11%). This suggests that while transformation and resourcing matter, they are seen more as enablers than front-line priorities in 2025's risk-driven environment.



SECTION 3

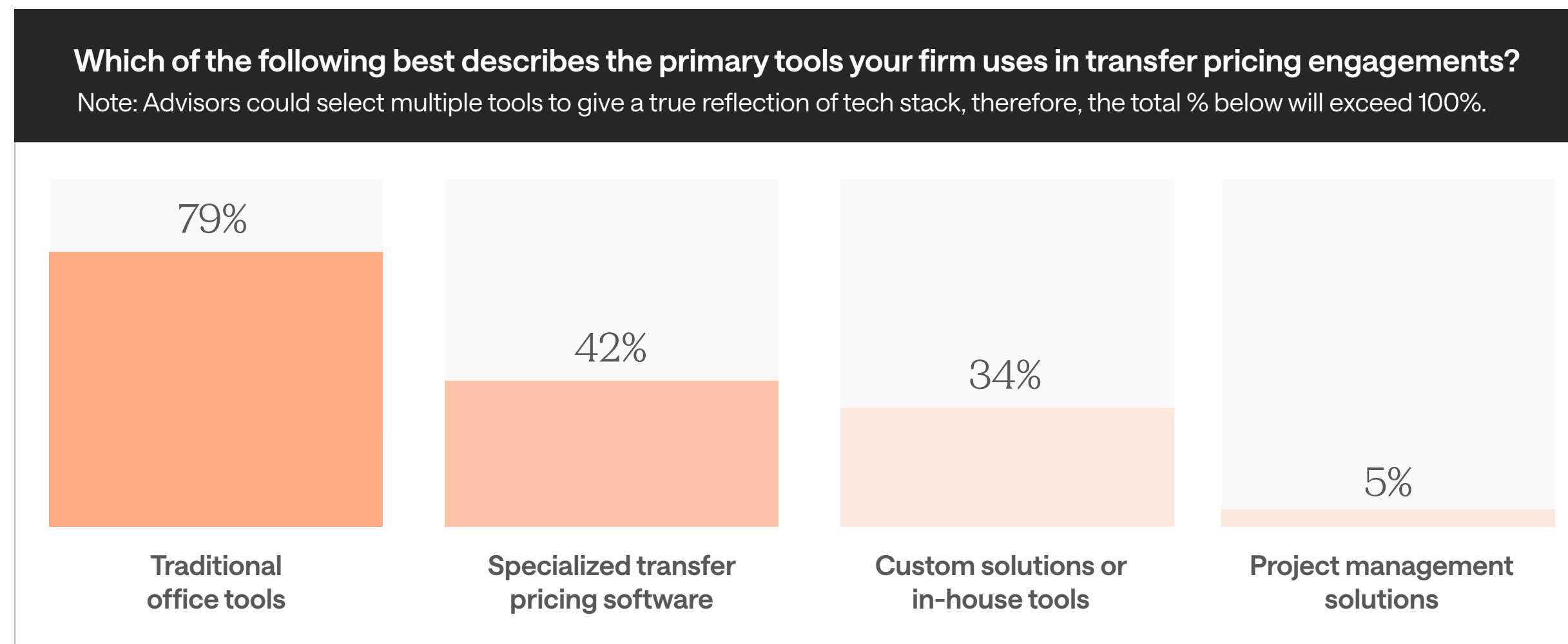
Advisors



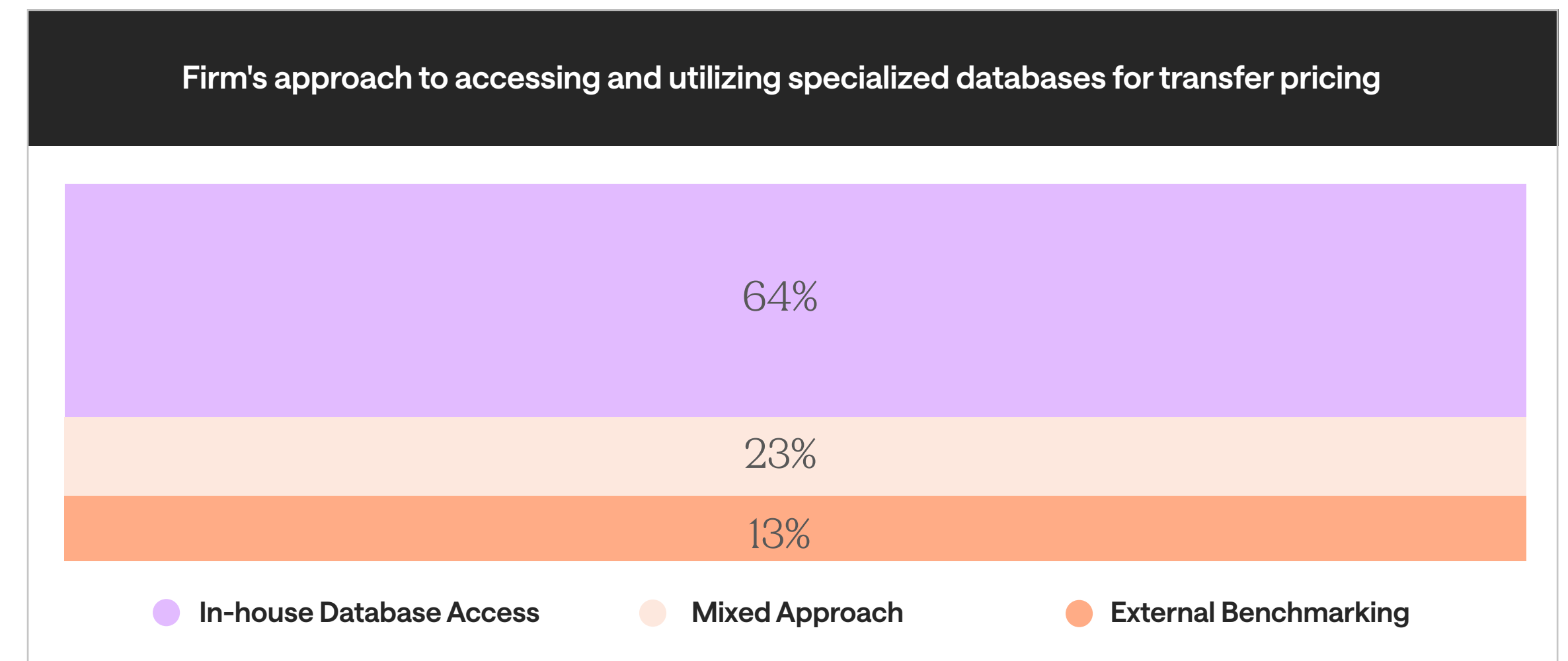
Use of Technology in Transfer Pricing Engagements

Excel Still Dominates, but Software Gains Ground

Advisors continue to rely heavily on traditional tools, but nearly half now also use purpose-built software. The shift is slow but steady, with signs of a more tech-enabled future emerging.



Excel and Word remain core to advisory work, but 42% of firms now report using dedicated TP software, a meaningful shift from legacy-only setups. One-third are developing or customizing their own tools, suggesting gaps in off-the-shelf solutions. Adoption of project management software is minimal, reinforcing the sense that most workflows are still document-driven rather than systematized.



On database access: In 2025, 64% of advisors use internal databases up from 56% in 2024. Mixed models rose slightly to 23% (from 20%), while reliance on external databases dropped to 13% (from 24%). The shift suggests more firms are bolstering their own in-house data capabilities rather than depending on third-party sources.

Key Takeaways

Excel use is near-universal, but often paired with other tools

TP software adoption (42%) signals rising confidence in purpose-built technology

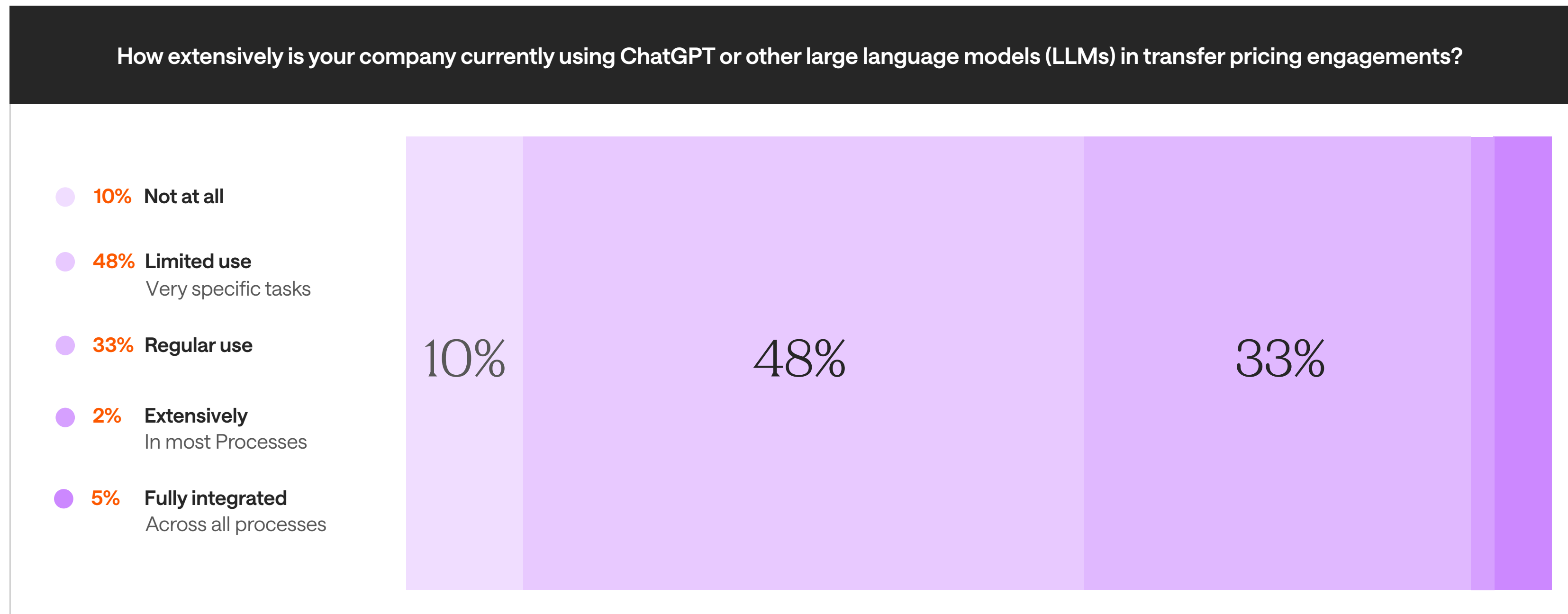
Custom tools (34%) suggest a demand for tailored capabilities

Workflow tech (5%) is largely untapped in the advisory space

AI and LLM Use in Advisory Work

From Curiosity to Capability

AI is no longer a novelty in advisory work. Regular usage of tools like ChatGPT has more than doubled since last year, and full disengagement has dropped by half. The shift reflects growing confidence and rising pressure to boost efficiency without expanding headcount.



Use Level	2024	2025
Not at all	20% ▼	10%
Limited use	60% ▼	48%
Regular use	16% ▲	33%
Extensively	4% ▼	2%
Fully integrated	Not Asked	5%

Advisory firms are quickly moving from light experimentation to routine use. In just one year, regular AI use jumped from 16% to 33%, while non-use was cut in half. Nearly half of advisors still use AI in a limited way, but with 5% “fully integrated”, suggests the existence of a small but growing group of early adopters. Overall, the market is shifting from testing AI to embedding it into day-to-day work.

Key Takeaways

Regular AI use has more than doubled (16% → 33%)

Non-use dropped sharply (20% → 10%)

Fully integrated AI now exists in 5% of firms - a sign of early maturity

Most firms are still cautious, but momentum is undeniable

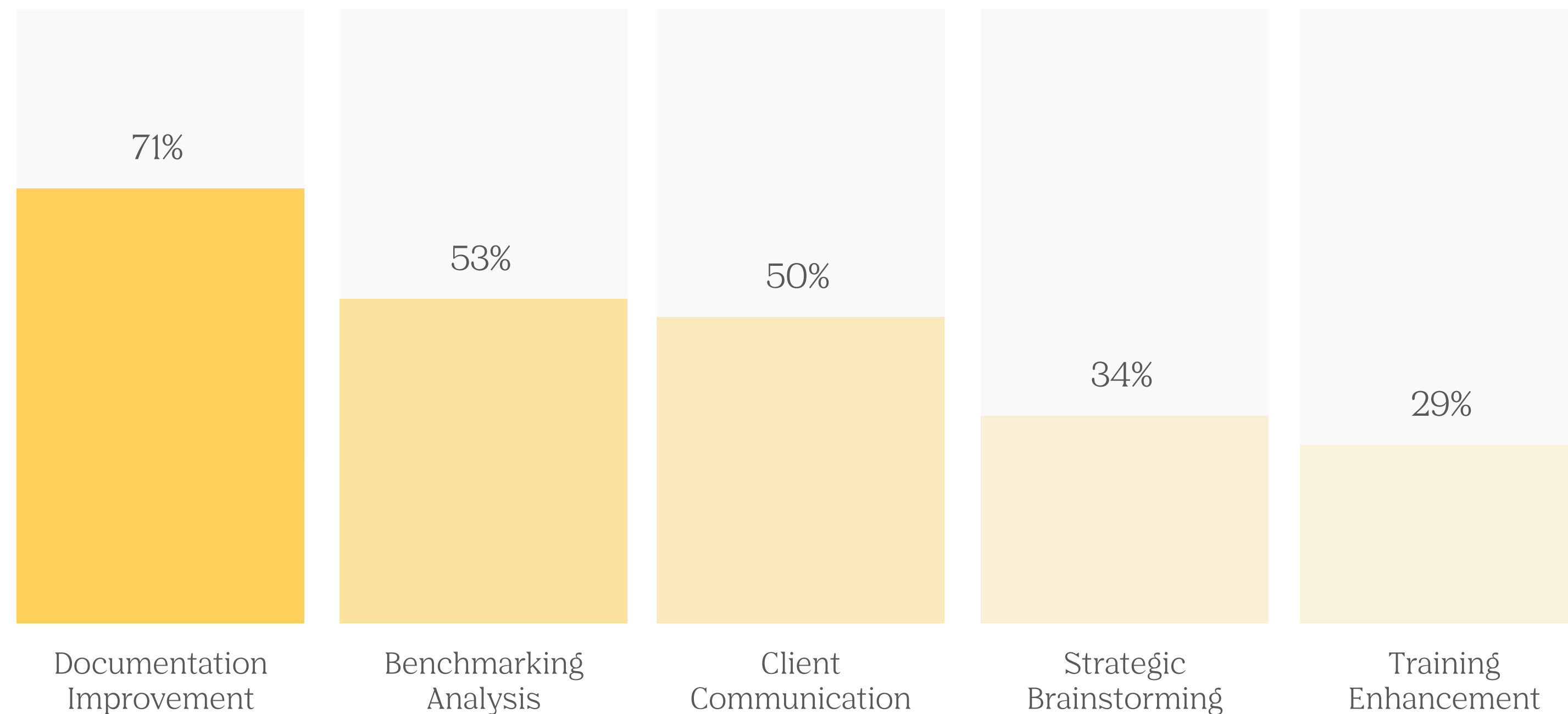
AI Usefulness in Advisory Work

Documentation First, Strategy Last

With AI use growing fast in the advisory space, the next question is how it's actually being applied. The answer? Mostly to speed up core deliverables. Advisors see the greatest value in using AI for documentation, benchmarking, and client communication, while strategic or developmental uses remain rare.

What primary benefit do you see in using AI tools in transfer pricing engagements?

Note: multi-selection allowed



AI's value is rooted in output, not insight.

It's being used to streamline repetitive work, especially documentation, where even small time savings can scale across multiple clients.

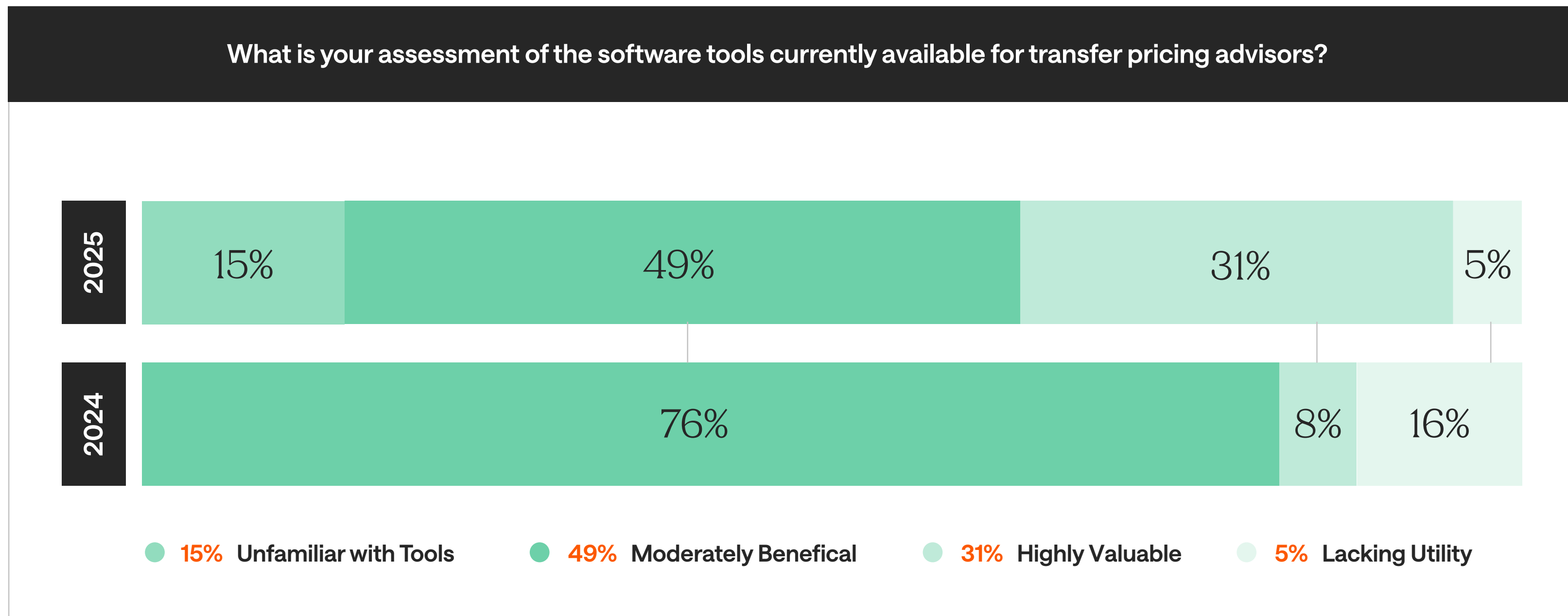
Benchmarking and communication tasks are also popular, thanks to AI's ability to organize, summarize, and standardize information.

But more strategic applications, like scenario planning or internal upskilling, remain largely untouched, pointing to a gap between potential and adoption.

TP Software Effectiveness

Confidence Is Growing, But Gaps Remain

As more advisors adopt specialized TP software, perceptions of value are improving. While most still view these tools as moderately useful, a growing share now sees them as highly valuable and far fewer consider them ineffective.



Perceptions of TP software are clearly trending upward in the advisory space - showcased by the sharp rise in “highly valuable” ratings (from just 8% to 31%).

This shift appears to come directly from the drop in “moderate” responses, suggesting that many who once saw limited benefits are now getting more out of their tools.

Meanwhile, the drop in “lacking usefulness” from 16% to just 5% is encouraging, though it may be partially explained by a new 2025 survey option allowing respondents to indicate unfamiliarity with TP software, which wasn't offered in 2024.

Key Takeaways

'Highly Valuable' ratings jumped nearly 4x year-on-year (8% → 31%)

The drop in “moderate” responses suggests growing satisfaction, not disengagement

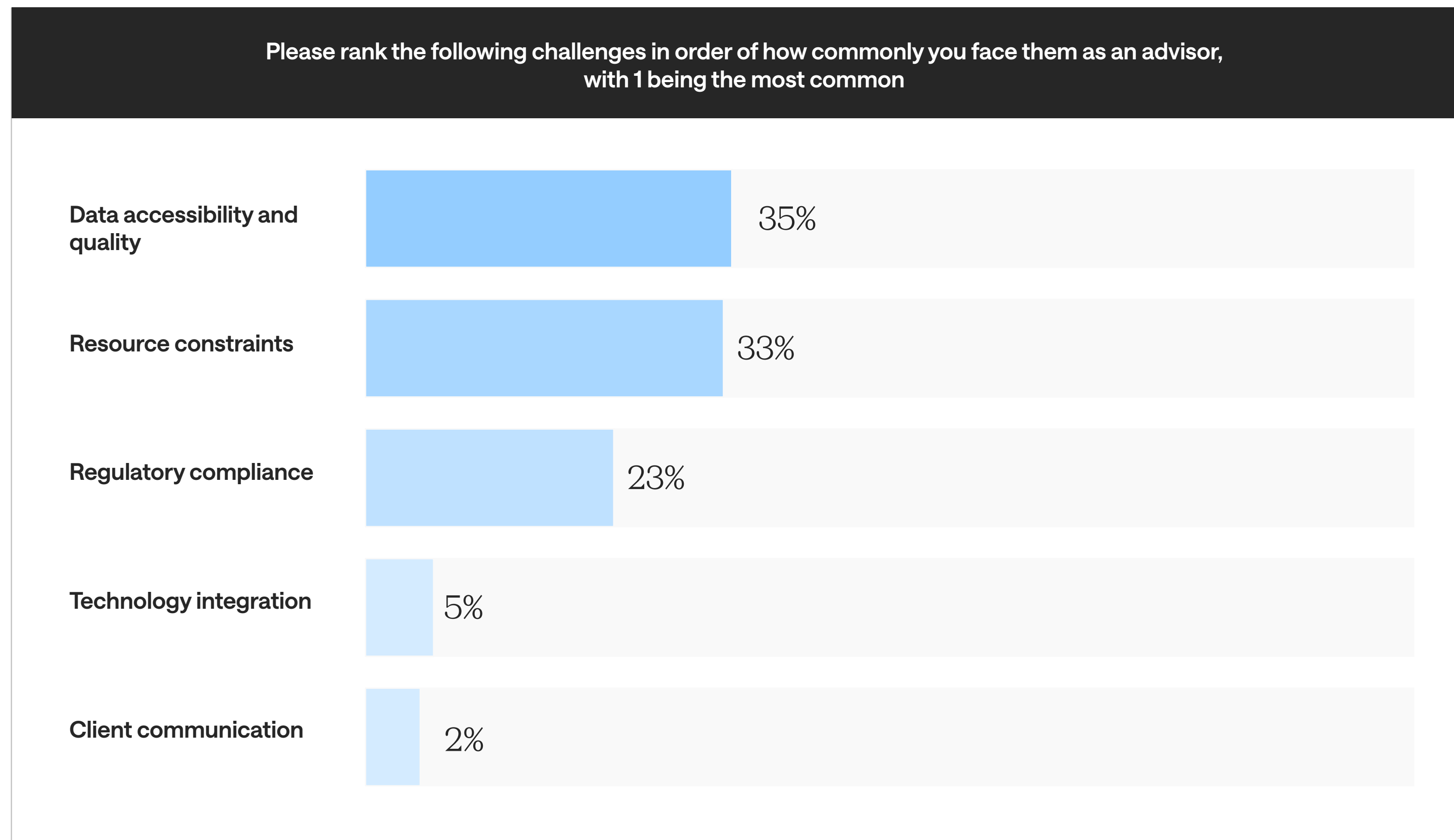
Only 5% now see little value, down sharply from 16% (but maybe many last year, would've selected 'Unfamiliar' if given the choice)

Software tools are delivering more and being recognized for it

Advisor and Client Challenges

Data Gaps and Resource Strains

Advisors are facing internal strain and so are their clients. Data quality and resourcing continue to top the list of advisor pain points, while clients are most burdened by operational inefficiencies and cost control. The message is clear: both sides are stretched.

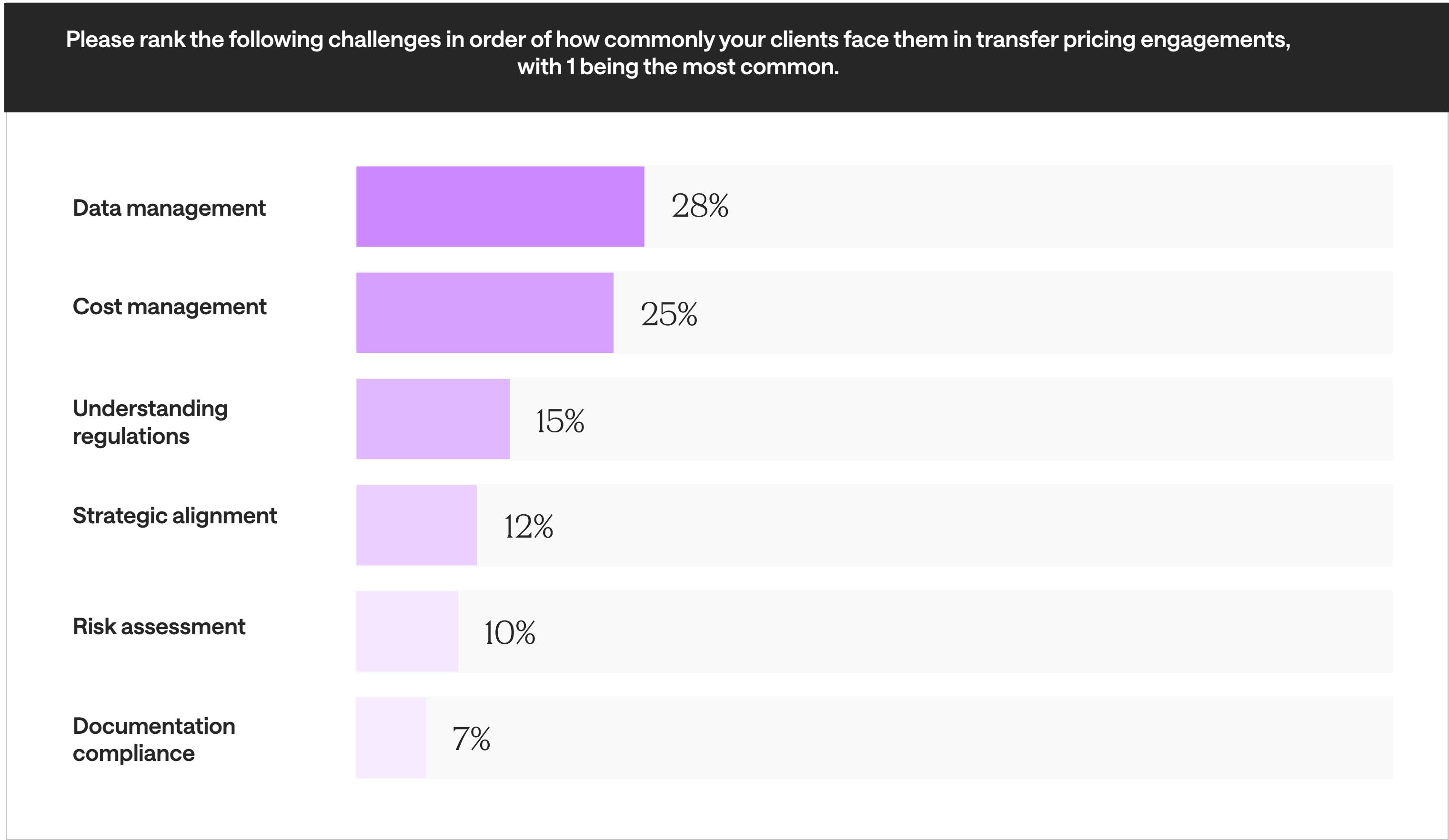


- 1 **Data accessibility, and quality**
Most common **top ranked** issue
- 2 **Resource constraints**
Second most cited
- 3 **Technology integration**
Less frequent, but still notable

Poor data remains the number one blocker for advisors, slowing down everything from benchmarking to documentation.

Resourcing is a close second, reflecting tight budgets, small teams, and increasing client demands. Technology integration is also a challenge, though cited less often, likely because many firms are still in the early stages of adoption, relying on manual workarounds instead of fully embedded systems.

Advisors were also asked to identify the most common challenges faced by their clients.



- 1 **Data management issues**
most frequently cited
- 2 **Cost management pressures**
Close second
- 3 **Team capacity & readiness**
Less frequent but present

Clients are struggling with the same issues as advisors but from the inside out.

Disorganized or siloed data is the top concern, making it hard to support TP processes efficiently. Cost pressures follow closely, as companies balance compliance demands with tight internal budgets. Many clients simply don't have the team size, tools, or bandwidth to stay ahead, which, in turn, puts more pressure back on their advisors.

ADVISOR AND CLIENT CHALLENGES

Key Takeaways

Advisors cite **poor data and stretched resources** as their biggest pain points

Clients are **struggling with data and cost**, driving demand for efficiency

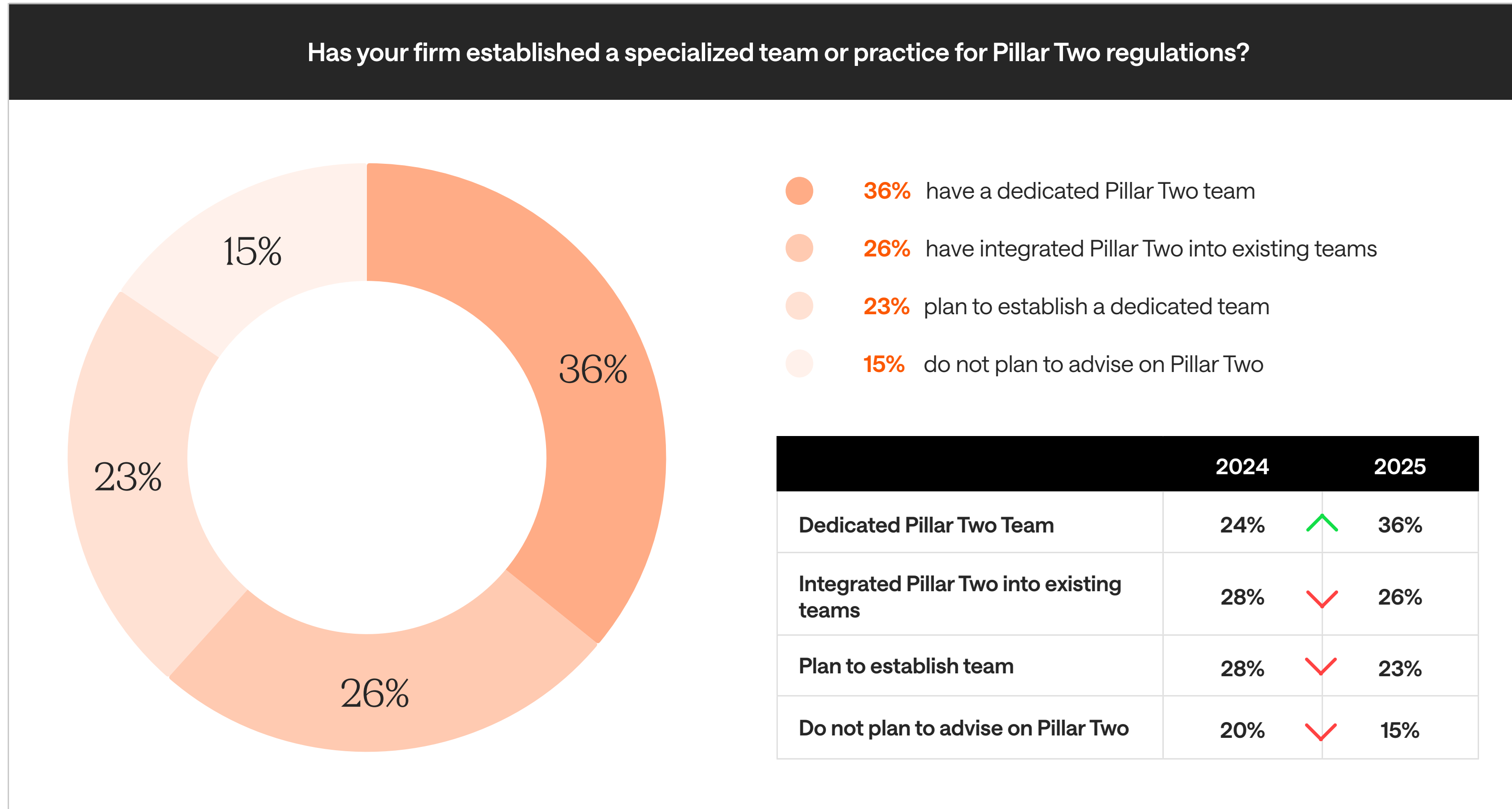
The burden is shared and **compounding** across both sides of the engagement

These pressures explain the push toward **automation, AI, and smarter tooling**

Pillar Two Advisory Trends

Building Capabilities Amid Global Uncertainty

Despite mounting political risk, advisors have continued to invest in Pillar Two readiness. More firms now offer full-service support, and dedicated teams are more common than in 2024. But with rising geopolitical tensions, particularly U.S. withdrawal from the deal, the future of Pillar Two is looking more fragile than expected.



Firms have steadily increased their commitment to Pillar Two, whilst its global viability has recently come under pressure. The share of advisors with dedicated teams rose from 24% to 36%, and fewer firms are opting out entirely. These moves reflect a market that, until recently, saw Pillar Two as inevitable and urgent.

Most advisory firms made their investments in capability, structure, and service models in response to strong regulatory momentum and client demand, well before recent political developments began to cast doubt on the agreement's future.

Now, with the U.S. withdrawing from the OECD deal and some European leaders openly questioning its longevity, firms may be forced to adjust. If global alignment falters, strategies may need to shift toward regional compliance models or tailored client responses, but the foundations many firms have built will still serve them well in navigating a potentially fragmented future.

	2024		2025
Dedicated Pillar Two Team	24%	↑	36%
Integrated Pillar Two into existing teams	28%	↓	26%
Plan to establish team	28%	↓	23%
Do not plan to advise on Pillar Two	20%	↓	15%

Bonus Insight

From Targeted Advice to Full-Service Pillar Two Support

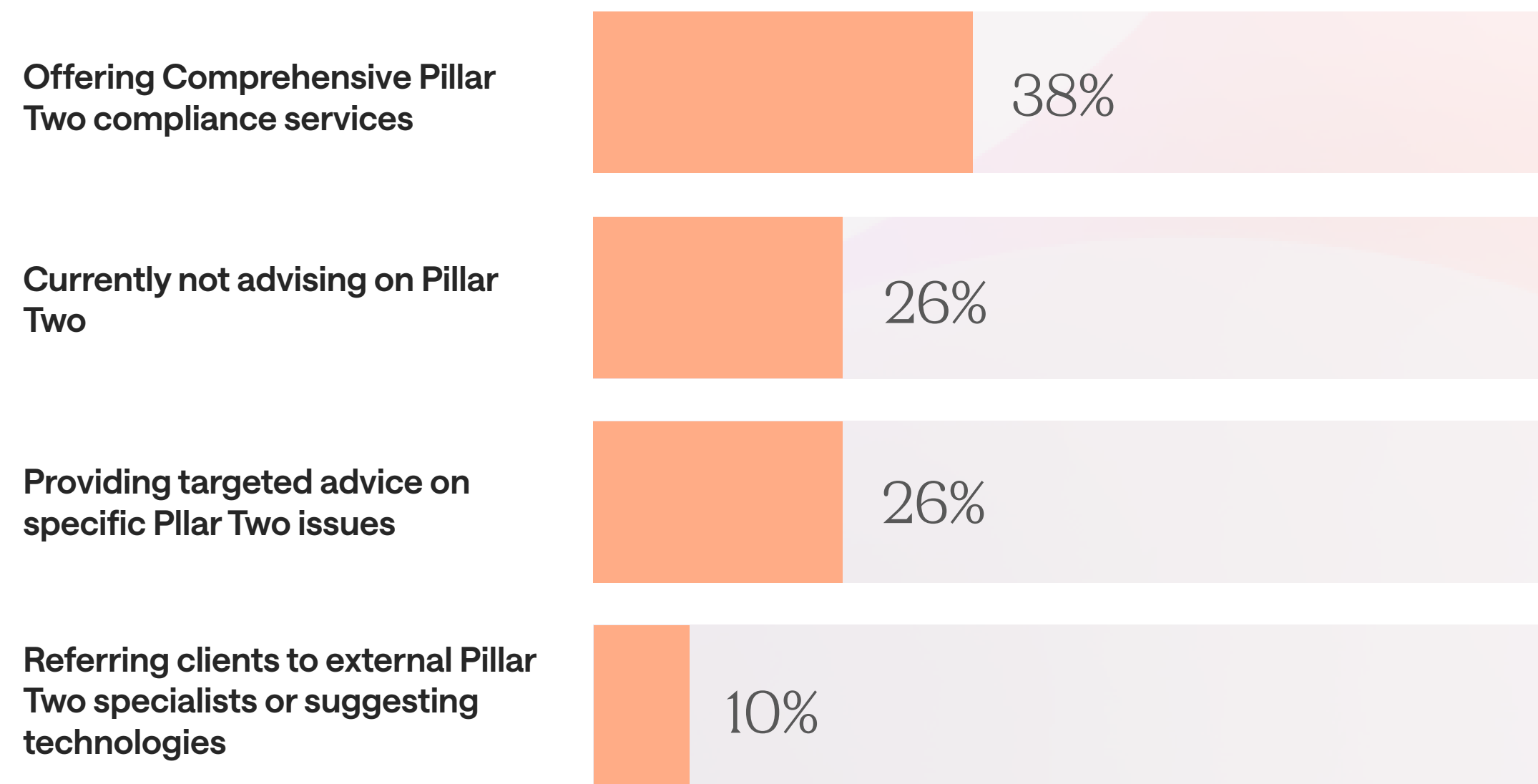
In 2024, the primary Pillar Two model for advisors was to offer targeted advice on specific Pillar Two issues. In 2025, that changed: **full-service compliance became the dominant approach**, rising to 38% (up from 28%), while targeted support dropped to 26% from 32%.

This shift shows that firms moved beyond light-touch guidance and invested in full delivery models. Whether that investment remains fully utilized will depend on how global adoption evolves.

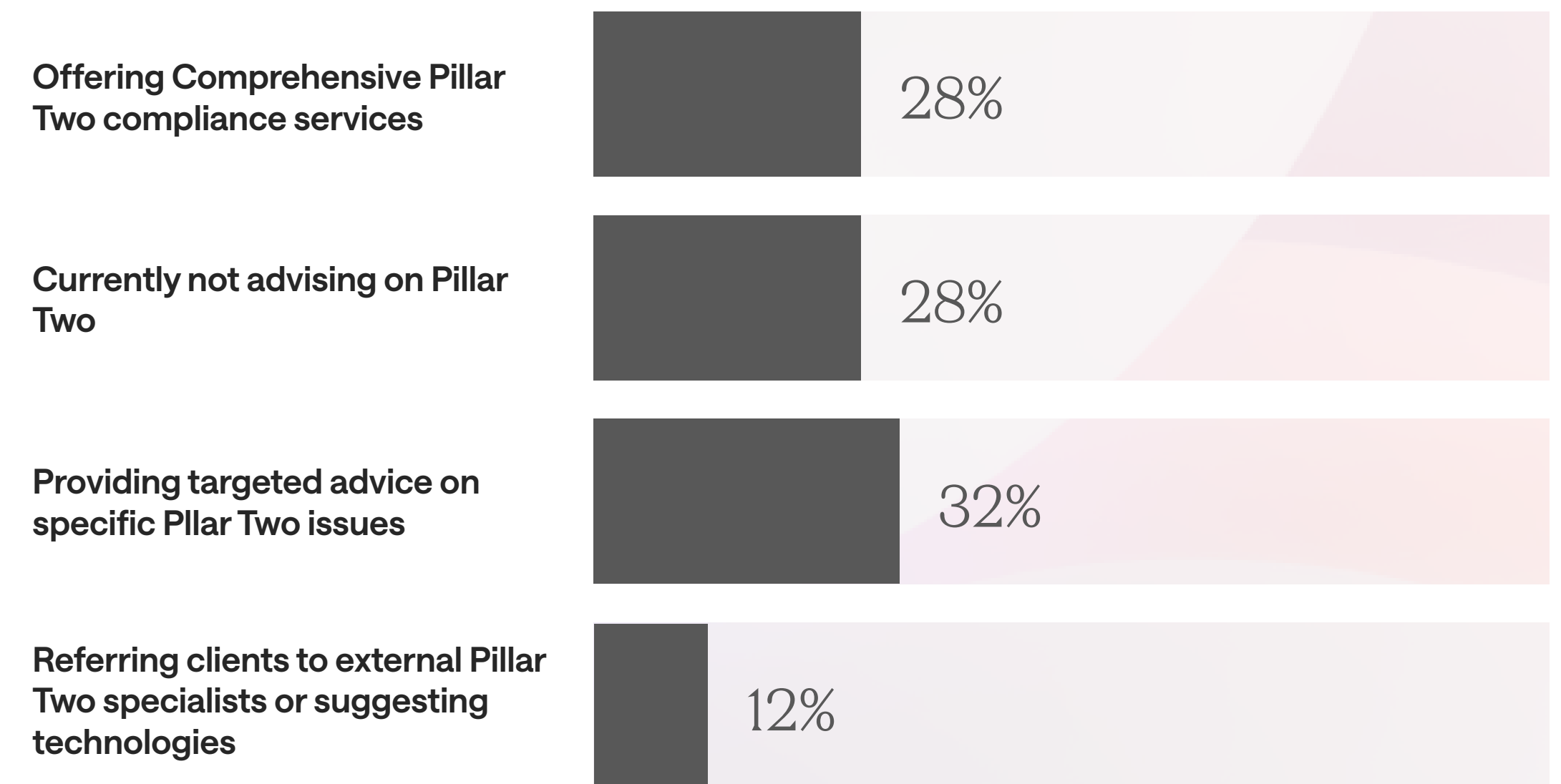
Key Takeaways

- 1 Advisors moved quickly and decisively to meet Pillar Two demand - 36% now have dedicated teams, up from 24%
- 2 In 2024, most firms offered targeted advice only, but by 2025, full-service compliance became the leading delivery model
- 3 The share of firms not advising dropped to 15%, showing widespread market participation
- 4 While the global outlook has become less certain, firms are now equipped to respond at scale, even if implementation splinters

What is your firm's strategic approach to advising clients on Pillar Two? (2025)

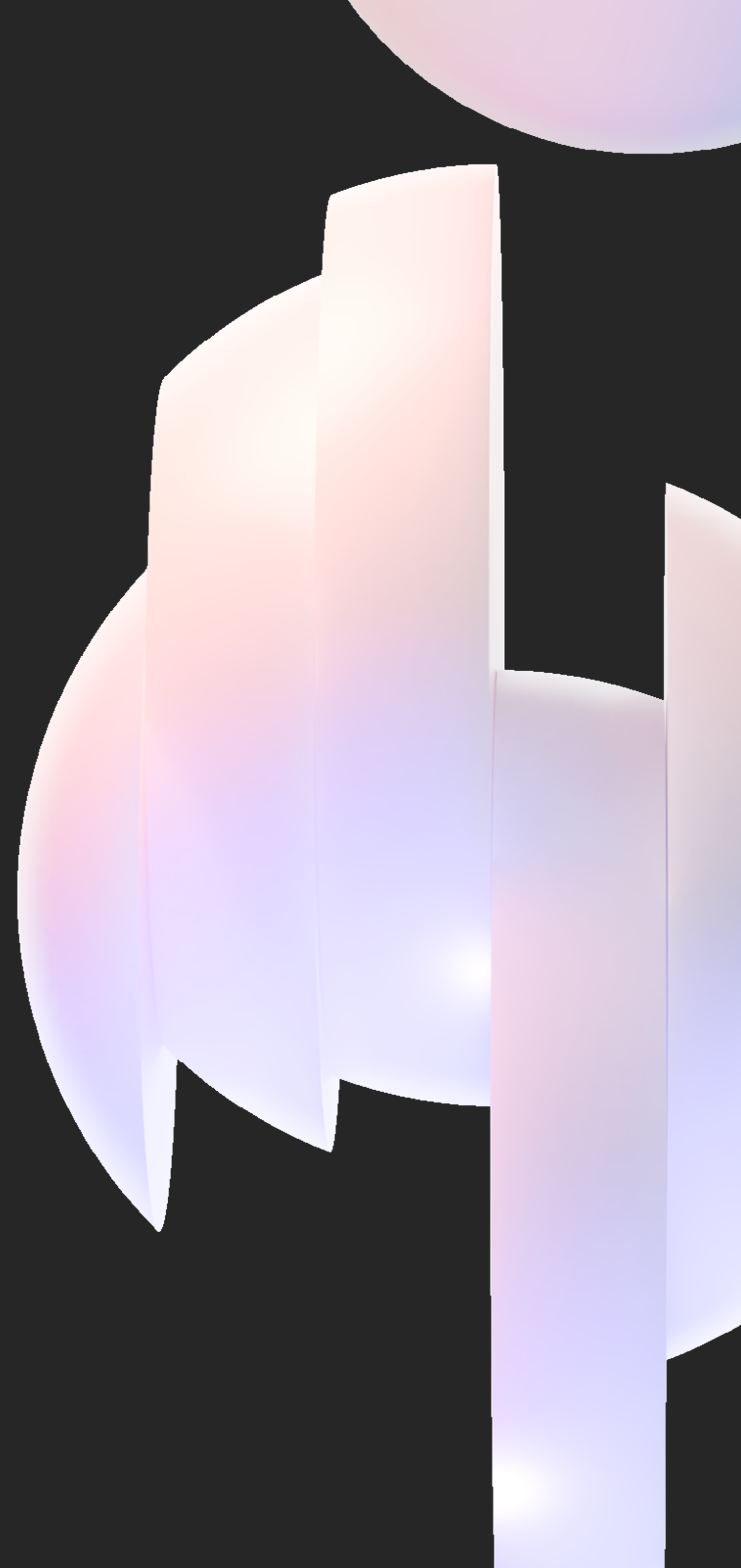


What is your firm's strategic approach to advising clients on Pillar Two? (2024)



SECTION 4

In-closing



Closing Remarks

Strategic control, not just compliance, defines the future of transfer pricing

The 2025 Aibidia Industry Report paints a clear picture of an inflection point in global transfer pricing. From audit pressure and data complexity to operational scale and AI exploration, this year's findings show a profession evolving rapidly under the weight of regulatory change and heightened expectations.

We see transfer pricing teams stepping into broader, more strategic roles. Leaders are shifting their focus from reactive compliance to proactive risk management, from documentation-as-defense to data-as-asset. Tax authorities are no longer just questioning the reasonableness of policies, they're demanding demonstrable, data-backed execution. Audit defense has surged to the top of the priority list, and rightly so - the time, cost, and technical rigor of responding to scrutiny are escalating fast.

But we're also seeing maturity emerge in how organizations invest in technology, structure their teams, and prepare for operational excellence, particularly around areas like OTP and documentation readiness. This reflects a growing recognition that current business-as-usual processes and tools are no longer fit for purpose in a world of expanding reporting obligations and real-time regulatory demands.

Encouragingly, the data shows momentum, not perfection. Structured data use is still limited, and adoption of AI and automation remains at an early stage. But the direction is clear: smarter, more agile tax operations are no longer aspirational. They are increasingly essential.

What stands out most is the shift from reaction to intent. TP teams are no longer simply adapting to change, they're setting clearer priorities, investing with purpose, and building capability from the

inside out. This includes not only legal and economic expertise, but also data literacy, AI fluency, process design, and low-code tool adoption. Whether it's audit preparedness, operational precision, or smarter use of data and technology, the direction is unmistakable: transfer pricing is becoming more embedded, more strategic, and more empowered.

It's a privilege to contribute to this year's report and to stand alongside the in-house and advisory professionals shaping what comes next. Let's keep pushing forward.

Edwin Baghdasarayan

PWC | Transfer Pricing Partner



Aibidia

Thank you

About Aibidia

Aibidia provides the technology that enables multinational enterprises to make more considered transfer pricing decisions.

Our connected, end-to-end platform provides organizations the ability to take full control of their business and implement considered tax strategies across the entire group.

With over 5,000 legal entities managed on our platform and an average revenue of 7 billion Euros among our clients, we are dedicated to helping the world's largest enterprises transform their cross-border business management, leading to healthy global business.

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