

## Seminar recap | Cross-border transfer pricing risk management for European enterprises

17 July 2026

On 17 July 2026, the thematic seminar on cross-border transfer pricing risk management for European enterprises, co-hosted by WTS China and German Chamber of Commerce (German Chamber) in China, was successfully held in Shanghai.

The event drew a broad cross-section of tax and finance professionals from European-invested companies across various industries, reflecting the widespread relevance of the topic.

Against the backdrop of tightening global anti-avoidance rules and the full rollout of China's Golden Tax Phase IV with multi-agency data integration, European-invested enterprises face unprecedented scrutiny. Tax authorities now leverage big data and related-party filings to detect profit shifting, transfer pricing mismatches, and hidden PEs with greater precision.

The central challenge for businesses lies in designing substance-over-form compliant structures that simultaneously optimize effective tax rates and withstand rigorous audit defence.



The seminar featured Ms. Maggie Han, Partner at WTS China, and Ms. Sissi Shen, Manager at WTS China, as keynote speakers. Through real audit case studies drawn from recent tax bureau practices, they addressed the most pressing risk areas and emerging enforcement trends, offering practical, defence-ready guidance on:

- 2026 transfer pricing audit priorities and trends,
- Case studies on transfer pricing audits and related dispute resolution mechanisms,
- Identification and mitigation of PE risks arising from related-party arrangements.

The interactive Q&A session proved particularly lively, with participants raising practical questions on common transfer pricing compliance challenges based on their own operational experiences. The speakers provided in-depth, case-illustrated responses, which were well received by the audience.

The success of the event owes much to the support of the German Chamber of Commerce in China and the active participation of all attendees.



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