

[Brand logo]

XYZ Group of companies

Master file for the Financial Year **20XX+1**

Prepared in **[month]** 20..

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1. Executive summary

This update provides a general overview of the transfer pricing policy used within the XYZ Group in accordance with the OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations (hereinafter referred to as 'OECD Guidelines') during FY 20XX+1 [This should be the year subject to review]. In addition, it addresses a number of specific subjects, such as the intangibles of the XYZ Group and its intercompany financial activities. This update, which constitutes the Master file for FY 20XX+1, should be read in conjunction with the Master file prepared for the XYZ Group for FY 20XX ("last year's Master file") (please refer to Appendix I). In addition, this Master file is complemented by Local files for operating group companies.

[Please add information on the XYZ group, its global footprint and the intercompany transactions it is engaged in the paragraphs below. This information should provide the reader of this Master file with a short snapshot of the XYZ group, consisting of, for example, a high level description of the activities, the most important markets it operates in, the turnover figure for 20XX+1 and the countries where it established group companies (or permanent establishment). Please find sample language below]

In last year's Master file, it was established that the XYZ Group is a leading provider of foreign exchange and money transfer services to individual travellers, corporate clients and migrants. It has hundreds of branches and outlets in prime locations across Europe, such as airports, railway stations and other fine locations in major tourist destinations.

Its operated through offices in the following countries:

- Czech Republic;
- France;
- Hong Kong;
- Italy; and
- South Africa

Due to its international operations and involvement in various stages of the value chain, the XYZ Group was involved in a number of intercompany transactions. These transactions, as identified in last year's Master file were:

- [Intercompany transaction 1];
- [Intercompany transaction 2]; and
- [Intercompany transaction 3];

Last year's Master file was established through a robust process. In particular, an analysis took place and a description was made of XYZ Group's organisational structure, business, intangibles, and intercompany transactions and financial and tax position.

Having said that, the relevant facts and circumstances as described in last year's Master file have not changed significantly in FY 20XX+1, nor has XYZ Group been involved in any controlled transactions other than the ones which were identified in the last year's Master file. In addition, no transfers took place of particular functions or intangibles in FY 20XX+1.

Since it was concluded that there were no significant changes in the overall activities of the XYZ Group and the various intercompany transactions the group companies were engaged in in FY 20XX+1, management believes that this Master file for FY 20XX+1, read in conjunction with the 20XX Master file, sufficiently assists tax administrations in evaluating the presence of the potential transfer pricing risks within the XYZ Group.

3. XYZ Group's organisational structure

3.1 Relevant item(s) to be considered

In this chapter, the main item to be considered is whether the legal and ownership structure of the XYZ Group changed compared to FY 20XX. The same questions applies for the geographical locations of the operating entities.

Organizational structure
Chart illustrating the XYZ Group's legal and ownership structure and geographical location of operating entities.

3.2 Relevant facts and circumstances for FY 20XX+1

XYZ Group's management indicated that the legal structure of the XYZ Group changed compared to FY 20XX. Please find below the legal group structure for FY 20XX+1.

[XYZ Group to provide legal structure for FY 20XX+1]

In addition to the above, the geographical locations of the operating entities did not change.

3.3 Transfer pricing analysis

The change in the legal structure of the group did not have a bearing on the transfer prices.

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