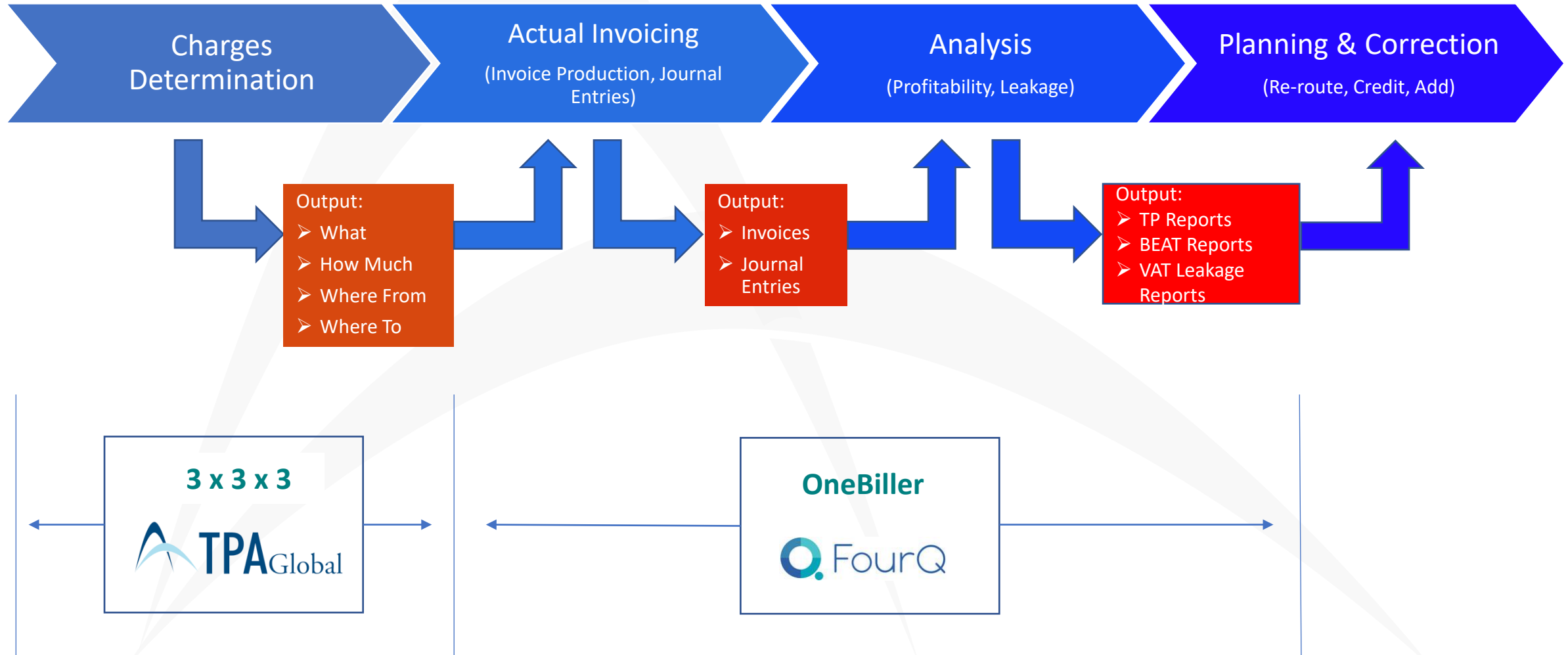
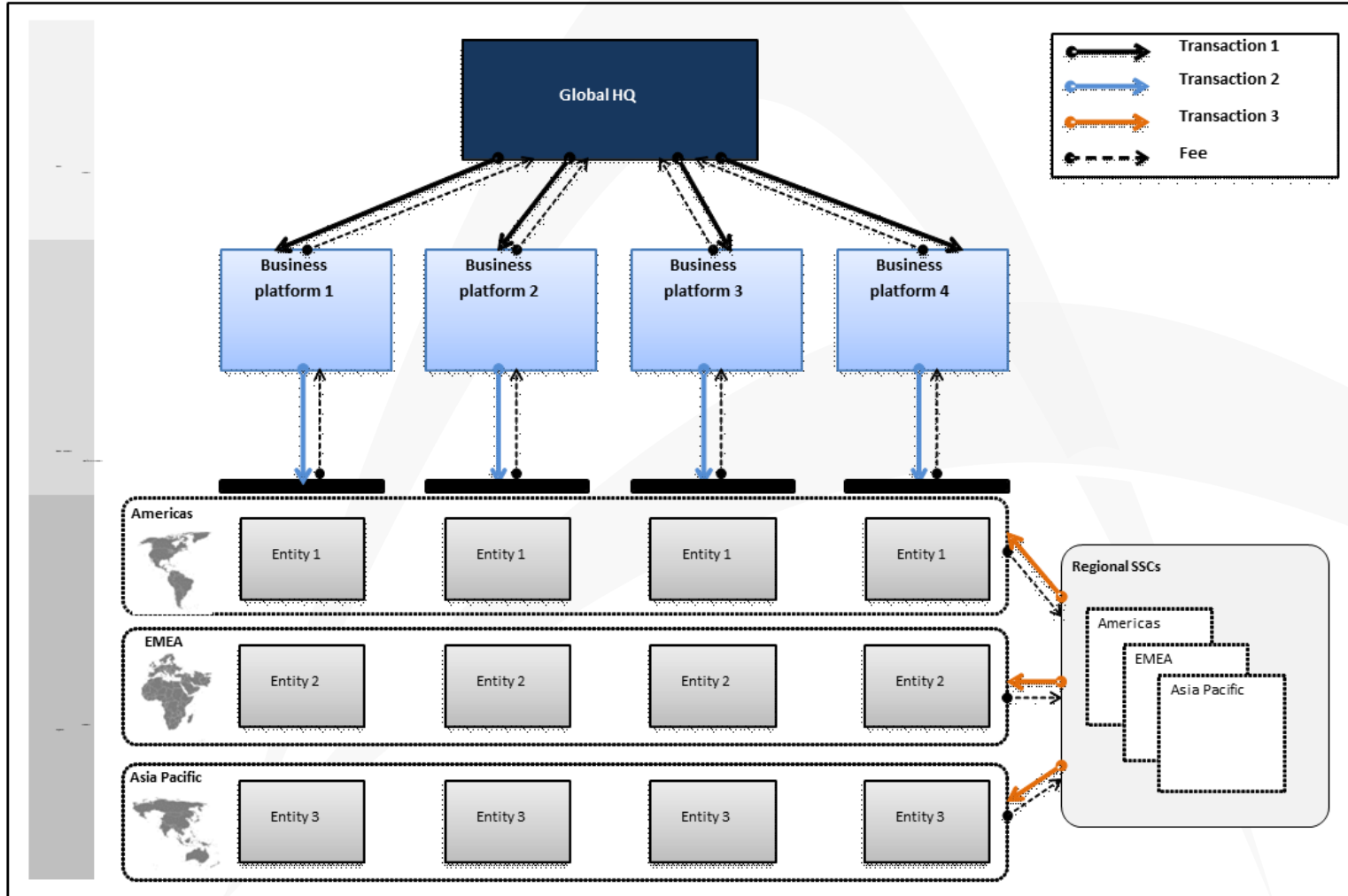


The 3x3x3 & OneBiller Approach

- A structured & automated process for HQ/SSC/Other I/C service charges

Wing-to-wing Process Description



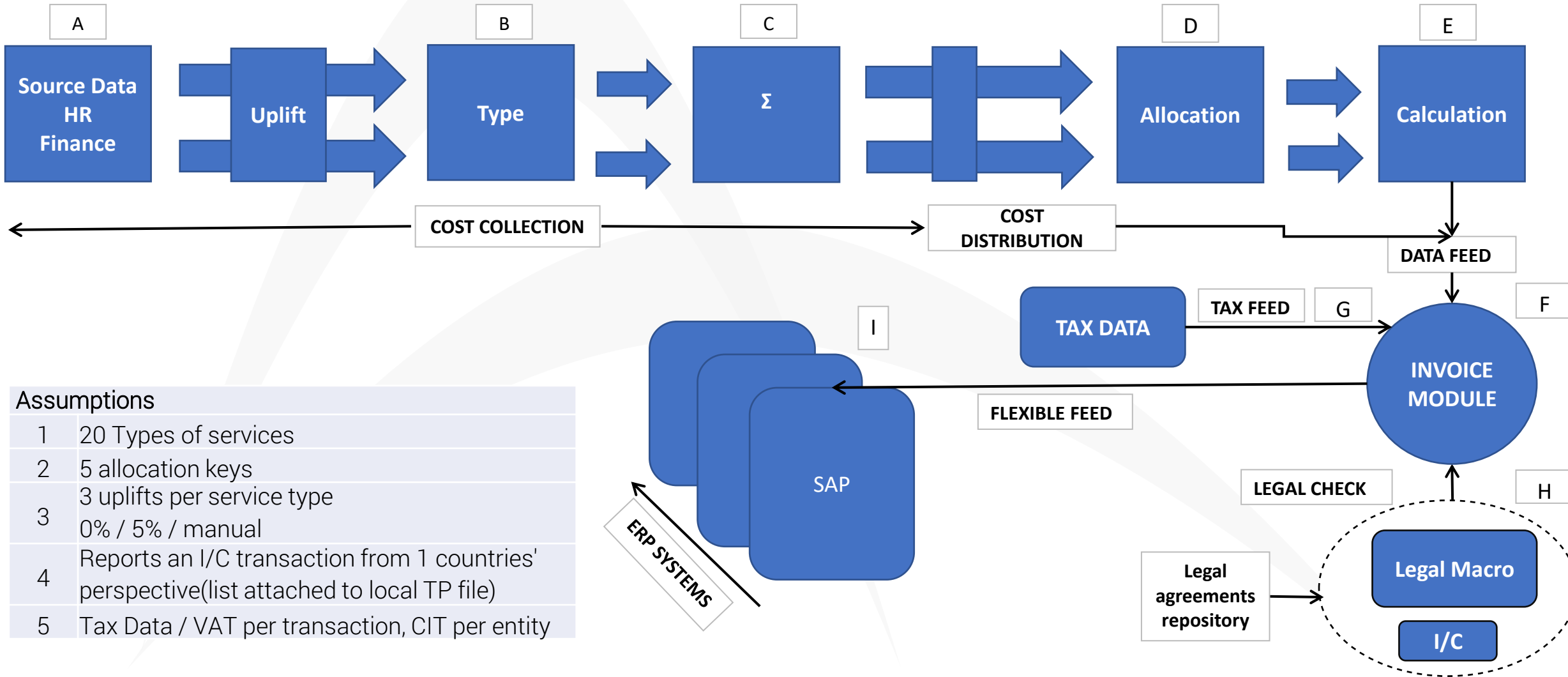


- Transitional cost and external 3rd party services
- 3x3x3 Model - a global structured way to intercompany services between CSPs, LSPs & SRs on 3 levels by (i) HQ (ii) SSC (iii) Business Unit

3 Types of centralized services (HQ/ SSC/ BU)
 3 Territories (Americas, EMEA & Asia)
 3 Defined roles of group companies (CSP/Contract Service Provider, LSP/Lead Service Provider, SR/Service Recipient)

Additional question:
 Can you run this model as a multiple parties services contract, i.e. a virtual netting/ pooling of services?

See Appendix C for an outline on the 3x3x3 model



Assumptions

1	20 Types of services
2	5 allocation keys
3	3 uplifts per service type
3	0% / 5% / manual
4	Reports an I/C transaction from 1 countries' perspective(list attached to local TP file)
5	Tax Data / VAT per transaction, CIT per entity

Poll: How do you collect data now

- Excel Spreadsheet by tax department
- Excel Spreadsheet by finance department
- Robotic Process Automation (RPA) tool
- There is no structure

Poll: How do you organize your I/C invoices for services

- Manual by tax department
- Manual by finance department
- Fully automated (central cost-to-invoice conversion)
- Fully automated (decentral cost-to-invoice conversion)

Poll: How many of the steps A-I have been automated in your organisation?

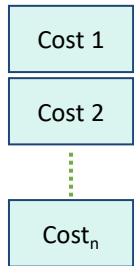
- <2
- <4
- <6
- all



OneBiller Invoicing Process Overview

Internal Customer Data

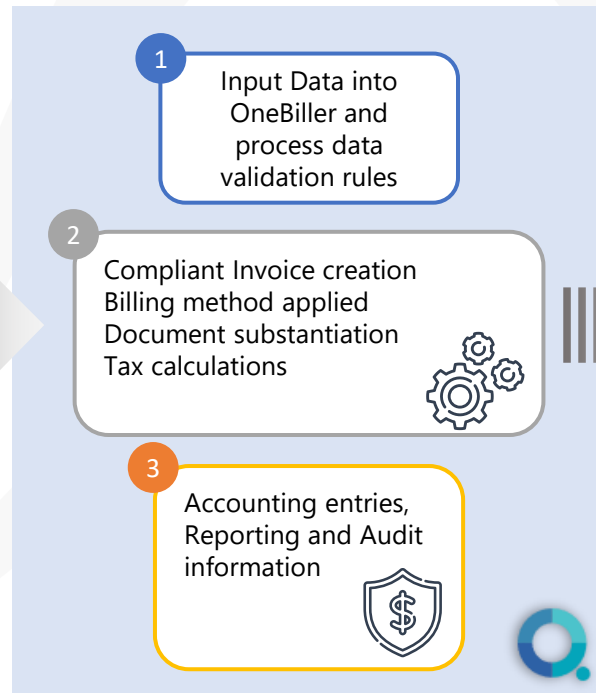
Cost Categories



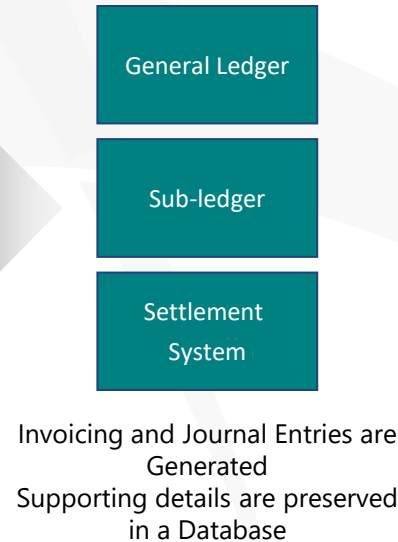
Seller Costs are pulled from GL. Data for Projects and Costs Centers feed¹⁾ into OneBiller



FourQ's OneBiller Processes



Client Accounting



1) All GL data is transferred into FourQ environment using SFTP and proper data protection policies

Charges
Determination

Actual Invoicing
(Invoice Production, Journal
Entries)

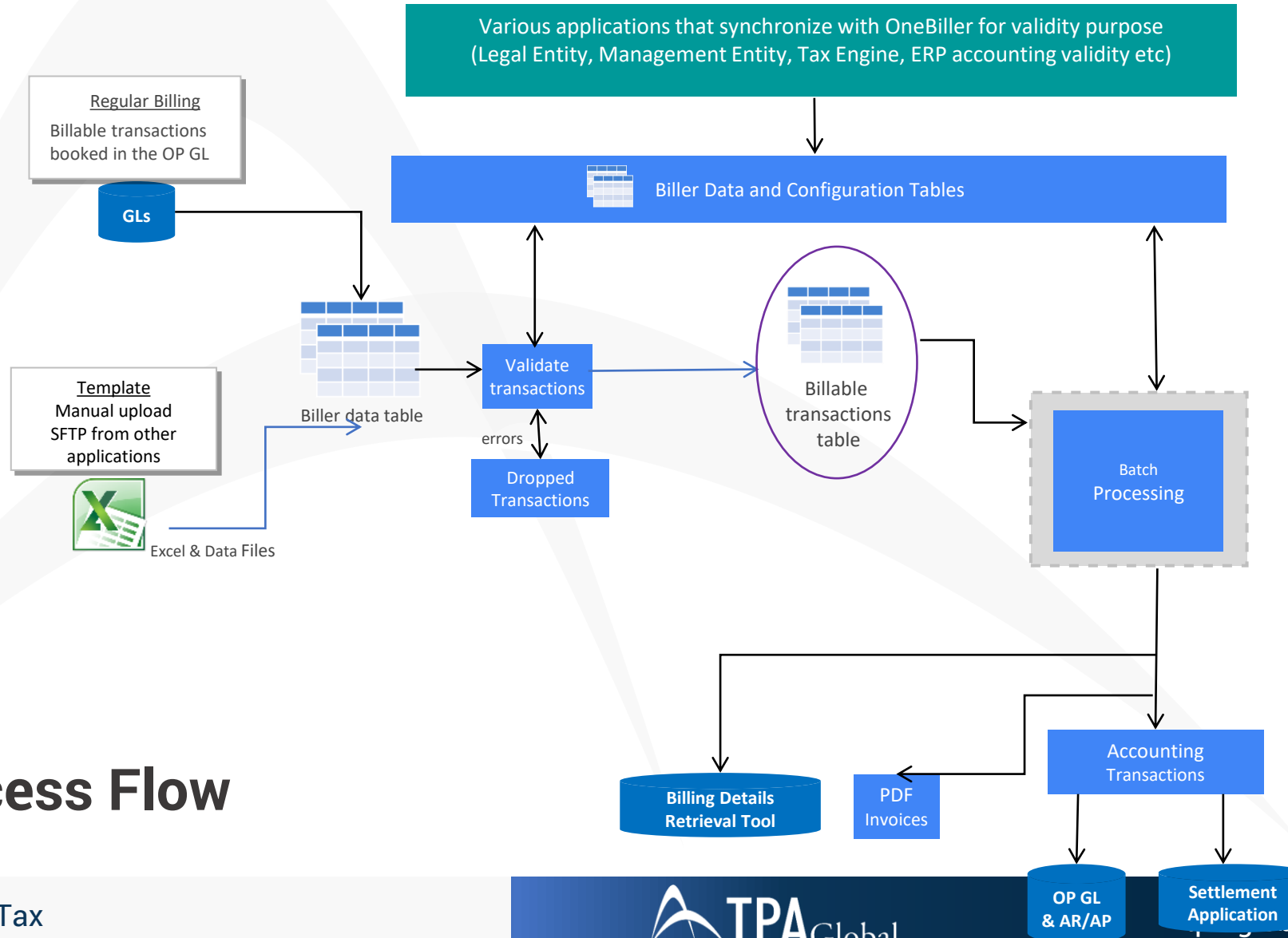
Analysis
(Profitability, Leakage)

Planning & Correction
(Re-route, Credit, Add)

OneBiller application receives billable transactions from the Operating General Ledger or through manual or mechanical upload via standard template.

We synchronize our data and configuration tables with various applications for validity and compliance purpose.

Batch Processing - we create PDF invoices, Seller records, transactions to be sent to the Settlement application as well as line level details behind each invoice.



OneBiller | Process Flow

Charges
Determination

Actual Invoicing
(Invoice Production, Journal
Entries)

Analysis
(Profitability, Leakage)

Planning & Correction
(Re-route, Credit, Add)

Data Feeds

Regular Billing
Billable transactions
booked in the OP GL



Template
Manual upload
SFTP from other
applications



Excel & Data Files

3 Types of Charging Methods / Data Feeds

Name	Type	Character	Degree of Automation	Examples	3x3x3 Relevance
Regular Billing	Actual expense-based	High-volume – High Frequency – Low Value per Charge	Highest ; OneBiller automatically pulls expenses from CCs & makes charge	Personnel charges (e.g. Expatriates costs)	CSP → LSP
Product Billing	Pre-determined rate card based	Standardized Services Billing with predictable cost levels of homogeneous services	High ; OneBiller automatically makes charges based on volumes (allocation key) collection x precalculated rates	Standardized global services like back-office and global IT	SSC → SR
Ad Hoc Billing	Incidental / as-needed	Made-for-purpose charges	Medium ; OneBiller automatically makes charge based on manually invoiced amounts	Management Fees, TP corrections	LSP → SR

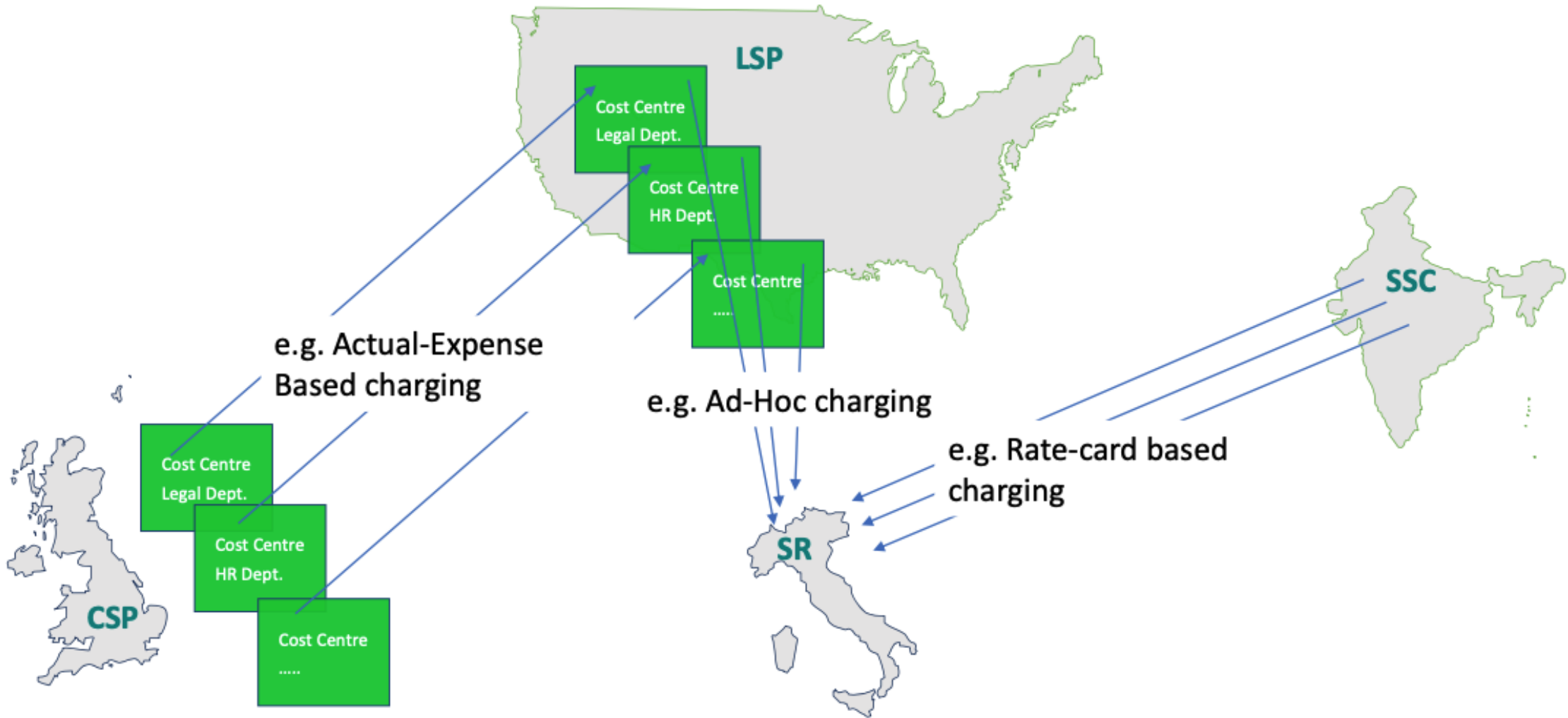
Covering All Types of Service Charges

Charges
Determination

Actual Invoicing
(Invoice Production, Journal
Entries)

Analysis
(Profitability, Leakage)

Planning & Correction
(Re-route, Credit, Add)



Maintaining granularity and transparency throughout the billing chain

Charges
Determination

Actual Invoicing
(Invoice Production, Journal
Entries)

Analysis
(Profitability, Leakage)

Planning & Correction
(Re-route, Credit, Add)

Invoicing Process Characteristics

ERP-agnostic

Invoice Production, TP Markup Application and Indirect Tax Treatment handled inside OneBiller

VAT-Compliant in 100+ Countries

VAT Invoice Texts and Rates Compliantly handled automatically inside OneBiller

Journal Entries into GL and Sub-Ledgers

Automated and Auto-Reconciled Journal Entries

Granularity and Transparency

No Aggregation of Services Needed / Full Line-Level Transparency of Invoicing

Charges Determination

Actual Invoicing
(Invoice Production, Journal Entries)

Analysis
(Profitability, Leakage)

Planning & Correction
(Re-route, Credit, Add)

CSP/LSP/SSC ('Seller-side') Entity Profitability Drill-Down

Seller PL					B-Route Details				
Country	Gold LE	PL #	LE Name	Region	Op GL	BUC	Cost Cntr	Ref-ID	Service Type Billed
US	Y99000	002	ACCOUNTING SERVICES OPERATIONS -	Americas	CCL	ACSTAX	000000	001X1C	Disbursement of Local VAT/Tax Liabilities
US	Y99000	002	ACCOUNTING SERVICES OPERATIONS -	Americas	CCL	ACSTAX	000000	0021PC	Disbursement of Local VAT/Tax Liabilities
US	Y99000	002	ACCOUNTING SERVICES OPERATIONS -	Americas	CCL	ACSTAX	000000	004HZC	Disbursement of Local VAT/Tax Liabilities
US	Y99000	002	ACCOUNTING SERVICES OPERATIONS -	Americas	CCL	ACSTAX	000000	004SVC	Disbursement of Local VAT/Tax Liabilities
US	Y99000	008	ACSSBP SHARED BASED PAYMENTS	Americas	CCL	ACSSBP	000000	0031BC	EQUITY AWARD FUNDING
US	Y99000	008	ACSSBP SHARED BASED PAYMENTS	Americas	CCL	ACSSBP	000000	0031CC	EQUITY AWARD FUNDING
US	Y99000	008	ACSSBP SHARED BASED PAYMENTS	Americas	CCL	ACSSBP	000000	0031DC	EQUITY AWARD FUNDING
US	Y99000	008	ACSSBP SHARED BASED PAYMENTS	Americas	CCL	ACSSBP	000000	003REC	EQUITY AWARD FUNDING
US	Y99000	008	ACSSBP SHARED BASED PAYMENTS	Americas	CCL	ACSSBP	000000	003RGC	EQUITY AWARD FUNDING
US	Y99000	008	ACSSBP SHARED BASED PAYMENTS	Americas	CCL	ACSSBP	000000	003SYC	EQUITY AWARD FUNDING
US	Y99000	008	ACSSBP SHARED BASED PAYMENTS	Americas	CCL	ACSSBP	000000	00459C	EQUITY AWARD FUNDING
US	Y99000	008	ACSSBP SHARED BASED PAYMENTS	Americas	CCL	ACSSBP	000000	0045AC	EQUITY AWARD FUNDING
US	Y99000	008	ACSSBP SHARED BASED PAYMENTS	Americas	CCL	ACSSBP	000000	0045BC	EQUITY AWARD FUNDING
US	Y99000	008	ACSSBP SHARED BASED PAYMENTS	Americas	CCL	ACSSBP	000000	0049BC	EQUITY AWARD FUNDING
US	Y99000	008	ACSSBP SHARED BASED PAYMENTS	Americas	CCL	ACSSBP	000000	004UDC	EQUITY AWARD FUNDING

Hundreds of thousands or line items, across 45 unique attributes

Traffic indicators highlight at risk entities with potential issues

Legal Entity ID	Net Costs Charged	Revenue	Profitability %
CP0018	21,026,404.0500	2,104,152.3900	10.01%
CP0052	115,717,324.3800	175,574.7900	0.15%
CP0058	3,215,106.4300	550,826.1100	17.13%

Summarized charges, revenues, and profitability by entity/division/ledger

Legal Entity	Net Charged	Net TP Revenue	Profitability
000C12	18,967,285	10,012	0.05%
000CG6	513,418,475	1,487,972	0.29%
A01098	1,094,181,870	18,973,084	1.73%
A01099	136,203,588	4,248,408	3.12%
CB1001	2,669,323	160,514	6.01%
CC2059	4,596,602	229,445	4.99%
CP0018	21,026,404	2,104,152	10.01%
CP0052	115,717,324	175,575	0.15%
CP0058	3,215,106	550,826	17.13%
CP0112	12,078,609	549,246	4.55%
CP0129	83,438	5,047	6.05%
CP1049	15,094,375	754,719	5.00%
CP1122	13,983,453	534,590	3.82%
CP1137	35,505,673	1,185,128	3.34%
CP1194	9,236,210	432,503	4.68%

Service Types - Charged Out	Net Costs Charged	Sum of TP Revenue	Profitability %
CP0052 - Total	115,717,324	175,575	0.15%
Accounting Support Services-R2R	-9,321	0	0.00%
Charge through of Genpact third party cost	6,615,400	0	0.00%
Customs Services-CST	440,646	22,032	5.00%
Disbursement of payroll costs on your behalf	103,223,165	0	0.00%
EHS - Environmental, Health and Safety advisory services	212,529	10,626	5.00%
Engineering - Operational Management	73,177	3,659	5.00%
Finance - Financial and Accounting Services	35,537	1,777	5.00%
Human Resources - Human Resources Services	345,572	17,279	5.00%
Information Technology - Information Technology Services	607,724	30,386	5.00%
Legal - Compliance Services	9,977	499	5.00%
Legal Services	24,924	0	0.00%

Drilldown to service level detail for research & analysis

Poll: How many tax audit are pending on Intercompany service charges at the moment?

- 1
- 2
- 3
- 4 or more

Poll: What is the financial impact of these audits?

- <100.000 euro
- <1.000.000 euro
- <10.000.000 euro
- >10.000.000 euro

Charges Determination

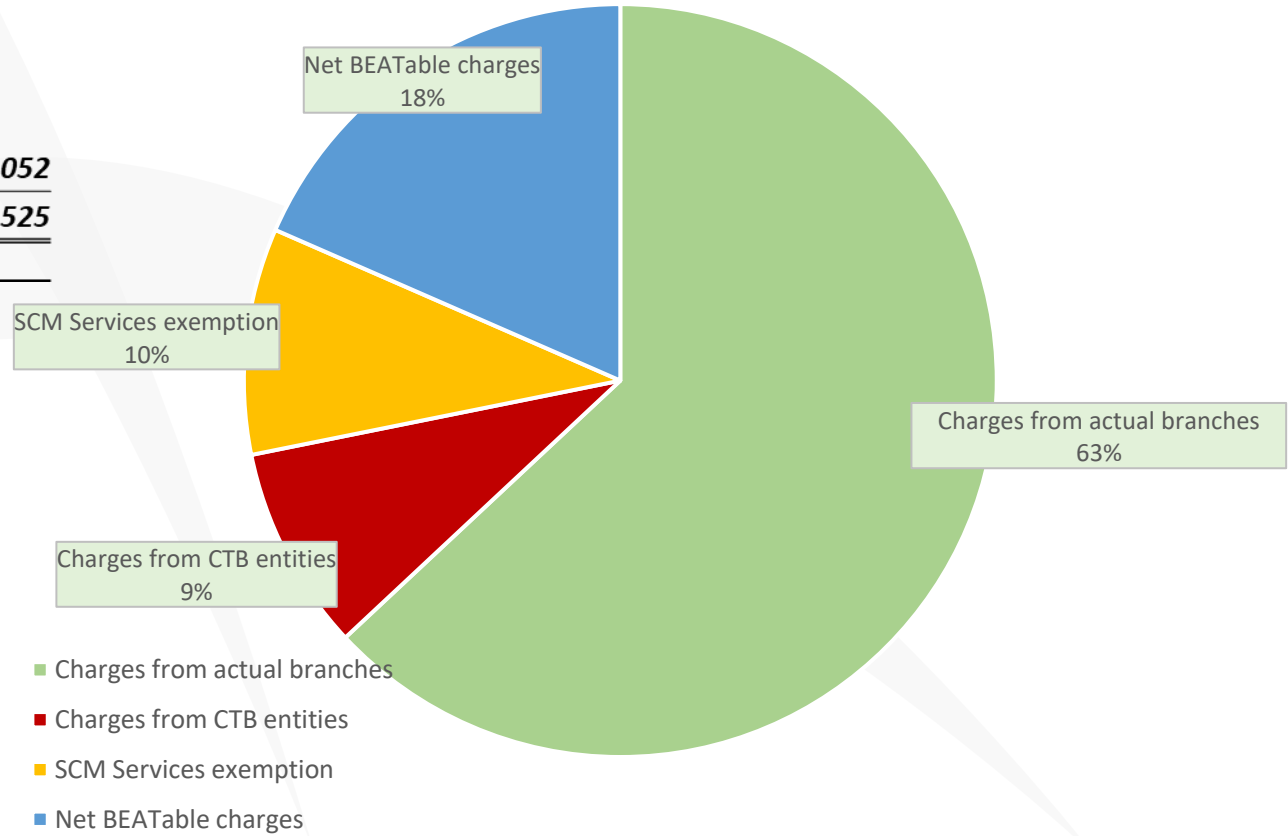
Actual Invoicing
(Invoice Production, Journal Entries)

Analysis
(Profitability, Leakage)

Planning & Correction
(Re-route, Credit, Add)

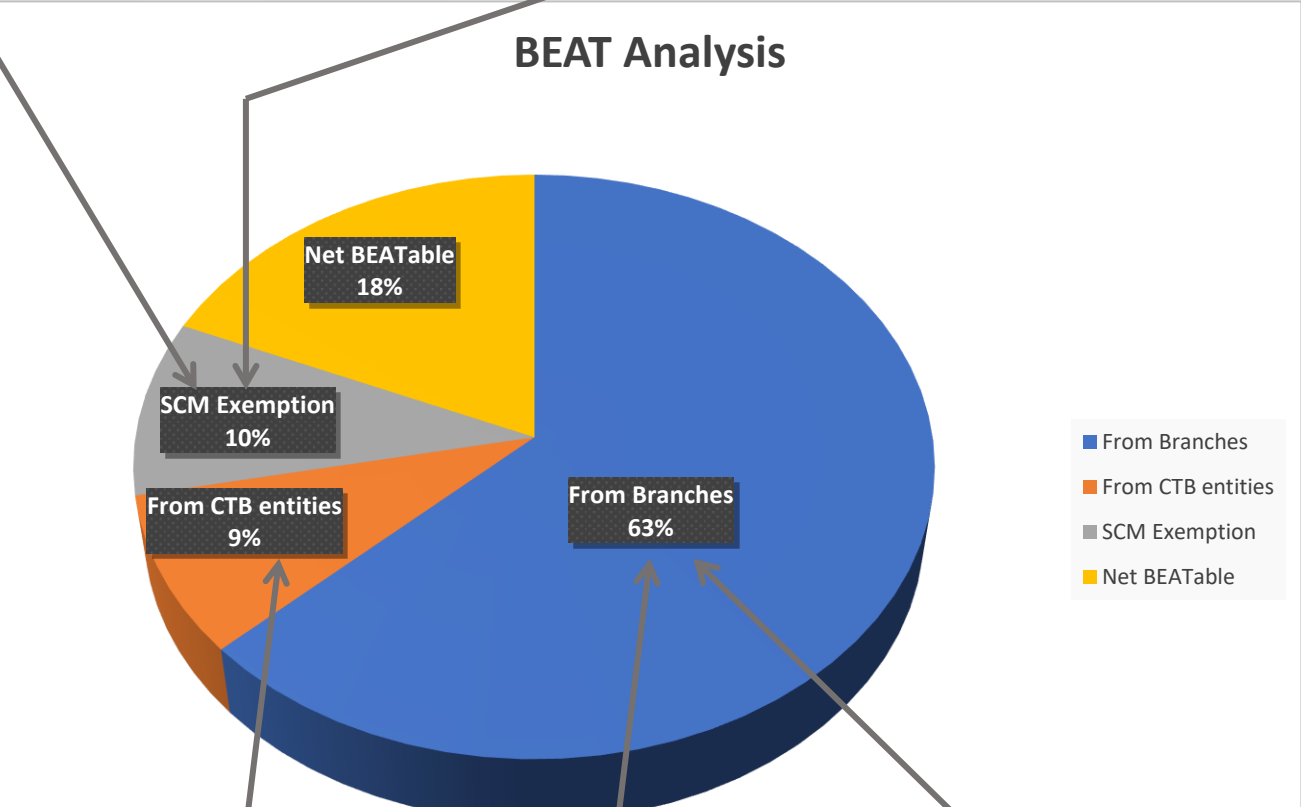
US Base Erosion and Anti-Abuse Tax ('BEAT') Analysis Report

Total charges to US from abroad		\$1,135,764,577
Charges from actual branches	\$715,946,974	
Charges from CTB entities	\$99,933,811	
SCM Services exemption	\$110,373,268	
Total exclusions	\$926,254,052	
Net BEATable charges	\$209,510,525	



OneBiller BEAT Analysis Report – Data sources

Seller PL		Billing Route Details			Buyer PL		Billing Activity (USD)				Data Imported from Gold		Processed data	
Country	Gold LE	Service Type Billed	SCM Exemption (Y/N)	Country	Gold LE	Total Net Charged	TP Revenue	Taxes	Total Gross Charged	Seller US CTB Status	100% Directly owned by US Shareholder?	TP MU %	X-Border VAT etc	
HU	CP1137	Human Resources - Human Resources Services	Y	US	Y99000	5.131,45	256,57	0,00	5.388,02			5,00%	0	
HU	CP1137	Human Resources - Human Resources Services	Y	US	Y99000	1.643,08	82,15	0,00	1.725,23			5,00%	0	
HU	CP1137	Statutory Financial Services-S2T	Y	HU	I00861	101.025,02	7.273,80	29.240,69	137.539,51			7,20%	n/a	
HU	CP1137	Statutory Financial Services-S2T	Y	BG	A01098	25.256,25	1.818,45	0,00	27.074,70			7,20%	0	
HU	CP1137	Statutory Financial Services-S2T	Y	HR	A01098	25.256,25	1.818,45	0,00	27.074,70			7,20%	0	
HU	CP1137	Statutory Financial Services-S2T	Y	RS	A01098	25.256,25	1.818,45	0,00	27.074,70			7,20%	0	



Seller PL		Billing Route Details			Buyer PL		Billing Activity (USD)				Data Imported from Gold		Processed data	
Country	Gold LE	Service Type Billed	SCM Exemption (Y/N)	Country	Gold LE	Total Net Charged	TP Revenue	Taxes	Total Gross Charged	Seller US CTB Status	100% Directly owned by US Shareholder?	TP MU %	X-Border VAT etc	
GB	000C12	Information Technology Service Delivery +	Y	GB	GC0200	952,00	57,13	-	1.009,13	CTB	Y	6,00%	n/a	
GB	000C12	Information Technology Service Delivery +	Y	GB	GC0200	238,00	14,29	50,46	302,75	CTB	Y	6,00%	n/a	
GB	000C12	Information Technology Service Delivery +	Y	GB	GC0200	2.975,00	178,50	630,71	3.784,21	CTB	Y	6,00%	n/a	
GB	000C12	Information Technology Service Delivery +	Y	IN	EXT172	714,00	42,84	-	756,84	CTB	Y	6,00%	0	

Seller PL		Billing Route Details			Buyer PL		Billing Activity (USD)				Data Imported from Gold		Processed data	
Country	Gold LE	Service Type Billed	SCM Exemption (Y/N)	Country	Gold LE	Total Net Charged	TP Revenue	Taxes	Total Gross Charged	Seller US CTB Status	100% Directly owned by US Shareholder?	TP MU %	X-Border VAT etc	
AE	A01098	Finance - Financial and Accounting Services	Y	US	A01098	2.169,97	108,50	-	2.278,47			5,00%	0	
AE	A01098	Finance - Financial and Accounting Services	Y	US	A01098	1.624,70	81,23	-	1.705,93			5,00%	0	
AE	A01098	Human Resources - Human Resources Services	Y	US	A01098	31.287,82	1.564,39	-	32.852,21			5,00%	0	
AR	A01098	Finance - Financial and Accounting Services	Y	US	A01098	6.348,18	280,74	-	6.628,92			4,42%	0	
AR	A01098	Servicios Administrativos	Y	US	A01098	2.686,52	188,06	-	2.874,58			7,00%	0	

Transforming the World



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OneBiller Reports – Coming Developments : VAT Leakage Reports & BEAT Simulation Capability

Seller PL		Billing Route Details		Buyer PL		Billing Activity (USD)				Data Imported from Gold		Processed data	
Country	Gold LE	Service Type Billed	SCM Exemption (Y/N)	Country	Gold LE	Total Net Charged	TP Revenue	Taxes	Total Gross Charged	Seller US CTB Status	100% Directly owned by US Shareholder ?	TP MU %	X-Border VAT etc
CN	CP0018	Property Rental and Facility Charges - China CTC (taxable)	N	CN	IF1857	(1.742,59)	(174,26)	(172,52)	(2.089,37)	CTB	Y	10,00%	n/a
CN	CP0018	Service Charge - GCR	N	ES	AL7829	37.437,17	3.743,72	2.470,85	43.651,74	CTB	Y	10,00%	2470,85
RU	CP0058	Business Support Services	N	US	A01098	10.844,43	542,22	2.277,33	13.663,98	CFC	Y	5,00%	2277,33
RU	CP0058	Business Support Services	N	US	A01098	59.630,70	2.981,54	12.522,45	75.134,69	CFC	Y	5,00%	12522,45
RU	CP0058	Business Support Services	N	US	A01098	8.569,84	428,49	1.799,67	10.798,00	CFC	Y	5,00%	1799,67
RU	CP0058	Business Support Services	N	US	A01098	12.661,20	633,06	2.658,85	15.953,11	CFC	Y	5,00%	2658,85

- 'What-If' simulation capability to analyze the impact of 'Checking-The-Box' (CTB) current CFCs
- X-Border VAT-Leakage reporting

Seller PL		Billing Route Details		Buyer PL		Billing Activity (USD)				Data Imported from Gold		Processed data	
Country	Gold LE	Service Type Billed	SCM Exemption (Y/N)	Country	Gold LE	Total Net Charged	TP Revenue	Taxes	Total Gross Charged	Seller US CTB Status	100% Directly owned by US Shareholder ?	TP MU %	X-Border VAT etc
CA	I00225	Services - Employee recruitment and retention supp	Y	US	Y99000	27.465,01	1.922,55	-	29.387,56	CFC		7,00%	0
CA	I00225	Services - Employee recruitment and retention supp	Y	US	Y99000	15.316,26	1.072,14	0,00	16.388,40	CFC		7,00%	0
HU	CP1137	Global Ops TAX Services	Y	SE	I10334	2.548,97	180,98	0,00	2.729,95	CFC		7,10%	0
HU	CP1137	Global Ops TAX Services	Y	BE	A01098	991,27	70,38	0,00	1.061,65	CFC		7,10%	0
HU	CP1137	Global Ops TAX Services	Y	GR	A01098	849,66	60,32	0,00	909,98	CFC		7,10%	0
HU	CP1137	Global Ops TAX Services	Y	US	A01098	3.152,23	223,81	0,00	3.376,04	CFC		7,10%	0
HU	CP1137	Global Ops TAX Services	Y	BG	HC1201	849,66	60,32	0,00	909,98	CFC		7,10%	0

- 'What-If' simulation capability to analyze the impact of reducing the TP mark-up to below 7% for SCM-type charges

Thank You

Our global network covers over 5,000 professionals who enable us to deliver scalable solutions in the area of tax & legal, digital transformation, running a compliance factory and effectively dealing with dispute resolution.

To ensure the highest quality and seamless service provision, thereby meeting international standards and regulations, a global team of dedicated professionals and specialists is a key and determining factor.

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