

Core Principles of Transfer Pricing

Aim:

Transfer pricing is an important tax and management topic for international companies. The tax rules related to transfer pricing are complex and tax authorities are increasingly proactive in scrutinising transfer pricing policies and practices. As such, it is important for taxpayers to identify and manage emerging tax risks related to transfer pricing.

This seminar has been specifically designed to meet the needs of professionals from various backgrounds who wish to understand the principles of transfer pricing, their practical application, and their impact on the operations in Cyprus and worldwide.

Objectives:

- Understand the importance of Transfer Pricing to multinational enterprise groups and tax administrators
- Provide an overview of international transfer pricing guidelines
- Analyse the various methods used to determine arm's length remuneration and discuss the criteria for selecting the most appropriate method for different types of transactions
- Discuss documentation requirements and best practices to ensure compliance with regulatory standards
- Update participants on recent changes in transfer pricing regulations

Who should attend the seminar:

The seminar is addressed to:

- CFOs
- Finance team members
 - Financial / Investment analysts
 - Tax specialists
 - Corporate Administrators
 - Portfolio managers



Instructor:

Christos Tziallas
BSc, ADIT

Christos is the founder and managing director of ADDVALUE Transfer Pricing Services Ltd. He started off his career in Transfer Pricing in 2013 with BDO and International Advisory Services in Greece and PwC Kazakhstan. In 2018 he joined Deloitte Cyprus where he was leading transfer pricing projects as a senior manager until 2024. Christos has more than 10 years of experience in Transfer Pricing, collaborating with multinational entities across diverse regions. His primary areas of expertise include conducting diagnostics of transfer pricing risks and providing recommendations on improving pricing policies, redesigning production and supply chains and consulting on the development of transfer pricing methodologies. Christos has significant experience in defending taxpayers during transfer pricing audits and has been involved in several Advanced Pricing Agreements (APAs). Christos has also delivered numerous Transfer Pricing trainings to companies operating both in the private and public sector.

Contact Us:

Seminars@globaltraining.org

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October 8th, 2024

9:00 – 17:15

7 CPDs

**Flexible mode of delivery:
Ground-based (Nic): €190
or Live Online €170**

SEMINAR PROGRAMME

Core Principles of Transfer Pricing		
Time	Duration	Description
9:00 – 10:30	1:30	<p>Session 1: The Arm’s Length Principle (ALP)</p> <p>Introduction to the Arm’s Length principle as the most acceptable to be used by MNE groups and Tax administrations in determining the Arm’s length pricing transactions between associated parties.</p> <ul style="list-style-type: none"> • The Arm’s Length Principle (ALP) • The OECD guidance on the application of the ALP • Scope of Transfer Pricing control <p>Session 2: Comparability analysis</p> <p>This session analyses the steps followed during the comparability analysis and the comparability factors to be assessed for the accurate delineation of related party transactions.</p> <ul style="list-style-type: none"> • Nine step-approach in performing comparability analysis • Comparability factors (economically relevant characteristics) • Functional analysis and characterization of the parties involved in the controlled transactions • Difficulties in identifying “perfect” comparable • Adjustments performed to increase comparability
10:30 – 10:45	0:15	Break
10:45 – 12:45	2:00	<p>Session 3: Transfer Pricing Methods</p> <p>This session introduces and critically assesses the transfer pricing methods recommended by the OECD TP Guidelines and guidance, through practical examples, on the application of the most appropriate transfer pricing method depending on the nature and the facts and circumstances of related party transactions.</p> <ul style="list-style-type: none"> • Comparable Uncontrolled Price (CUP) Method • Resale Price Method • Cost plus (C+) Method • Transactional Net Margin Method (TNMM) • Transactional Profit Split Method <p>Session 4: Special considerations for intra-group services</p> <p>This session provides guidance on the types of intra-group services and selection of the most appropriate method to determine the arm’s length price/remuneration.</p> <ul style="list-style-type: none"> • Special considerations regarding the pricing of intra-group services • Chargeable and non-chargeable services • Direct and indirect chargeable methods • Selection of the most appropriate method for the documentation of transactions involving services • Pass-through costs • Low value adding intra-group services
12:45 – 13:30	0:45	Lunch Break

13:30 – 15:30	2:00	<p>Session 5: Intra-group transactions involving intangibles</p> <p>This session an analysis of the factors considered for transactions involving royalties and sale of intellectual property and determination of the most appropriate method for the documentation of such transactions. Definition and types of intangibles</p> <ul style="list-style-type: none"> • Definition and types of intangibles • DEMPE analysis • Selection of the most appropriate method for the documentation of transactions involving intangibles <p>Session 6: Intra-group financials transactions</p> <p>This session provides guidance on the accurate delineation of financing transactions and the pricing of intra-group loans.</p> <ul style="list-style-type: none"> • The OECD Guidance on financial transactions • OECD proposed approaches to pricing intra-group loans • Determining the arm’s length nature of intra-group loans • Interest rate analysis
15:30 – 15:45	0:15	Break
15:45 – 16:30	0:45	<p>Session 7: Business restructurings</p> <p>This session provides an analysis of the types of restructurings and the approach proposed by the OECD TP Guidelines for the documentation of business restructurings.</p> <ul style="list-style-type: none"> • Types of restructuring • OECD proposed approaches to analyse restructurings • Remuneration of the related parties pre and post restructuring
16:30 - 17:15	0:45	Summary / Questions and Answers
Total Net Duration	7:00	End of Seminar

Certification:

All participants will be awarded a certificate. Each hour of attendance will account for one unit of Continuing Professional Development (CPD) as required for members of most professional bodies.