

Description & Aim:

Financial transactions are frequently used and comprise one of the most significant of transactions within multinational groups. As with other types of related party transactions the terms and conditions between related parties should be in accordance with those that would be agreed upon by unrelated parties in similar circumstances.

Pricing of financial transactions is a complex area of transfer pricing and tax authorities see this area as one of substantial potential Transfer Pricing risks, which may lead to expensive and time-consuming audits and potential double taxation, ultimately resulting in significant unanticipated tax exposure for taxpayers.

This seminar has been specifically designed to meet the needs of professionals from various backgrounds who wish to obtain in depth understanding on the pricing of related party debt, guarantee fees, cash pooling arrangements and other financial instruments.

The seminar aims to provide an interpretation of the recommendations included in the OECD TP Guidelines with respect to intra-group financing and guidance, including practical examples, on the application of methodologies proposed for determining the arm's length remuneration in related party financing arrangements. Moreover, the seminar will provide an update of the local TP legislation and the practice of the Cyprus tax authorities on this specific type of transactions.

Who should attend the seminar:

The seminar is addressed to:

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



Transfer Pricing Training on Intra-Group Financial Transactions

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 16th, 2024

9:00 – 17:15

7 CPDs

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

SEMINAR PROGRAMME

Transfer Pricing Training on Intra-Group Financial Transactions

Time	Duration	Description
9:00 – 11:00	2:00	<p>Session 1: Analysis of financial transactions from the OECD TP Guidelines perspective</p> <p>This session provides an understanding of the treatment of intragroup financial transactions from the OECD TP Guidelines perspective.</p> <ul style="list-style-type: none"> • The arm’s length principle • OECD Guidance on financial transactions • Economically relevant characteristics of the financial transactions • Accurate delineation of the intra-group financial transactions and recharacterization • Thin capitalisation rules <p>Session 2: Credit risk and credit ratings</p> <p>This session provides guidance on the assessment of the creditworthiness of debt issuers and specific debt issues.</p> <ul style="list-style-type: none"> • Introduction to credit risk and credit ratings • Standalone credit rating • Group (implicit) support • Corporate and issue specific credit ratings • Seniority rankings • Tools and methodologies used for credit rating assessment
11:00 – 11:15	0:15	Break
11:15 – 12:45	1:30	<p>Session 3: Intra-group loans</p> <p>This session provides guidance on the methodologies proposed by the OECD TP Guidelines for determining the arm’s length interest rate on intra-group loans.</p> <ul style="list-style-type: none"> • Determining the arm’s length nature of intra-group loans • OECD proposed approaches to pricing intra-group loans • Interest rate analysis • Practical examples
12:45 – 13:30	0:45	Lunch Break
13:30 – 15:00	1:30	<p>Session 4: Financial guarantees</p> <p>This session provides guidance on the methodologies proposed by the OECD TP Guidelines for determining the arm’s length remuneration for financial guarantees.</p> <ul style="list-style-type: none"> • Different types of intra-group financial guarantees and relevant characteristics to consider • The application of the arm’s length principle to intra-group financial guarantees • Determination of the arm’s length price of financial guarantees • Practical examples <p>Session 4: Cash pooling</p> <p>This session provides guidance on the methodologies proposed by the OECD TP Guidelines for determining the arm’s length remuneration of the cash pool participants.</p> <ul style="list-style-type: none"> • Cash pool structures • Accurate delineation of cash pooling transactions • The application of the arm’s length principle to cash pooling arrangements • Determination of the arm’s length price of cash pooling arrangements • Practical examples
15:00 – 15:15	0:15	Break

Time	Duration	Description
15:15 – 16:45	1:30	Session 5: Other intercompany financial transactions This session provides guidance on the methodologies proposed by the OECD TP Guidelines in determining the arm's length remuneration for specific type of financing transactions. <ul style="list-style-type: none"> • Remuneration of treasury functions • Back-to-back financing arrangements • Accounts receivable factoring • Facility and commitment fees
16:45 – 17:15	0:30	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.