



Transfer Pricing Masterclass Series 2019

DLA Piper's Transfer Pricing Team are delighted to invite you to the third Masterclass of 2019. The event is free to attend and would be of interest to those with tax functions who are engaged in transfer pricing and controversy management, as well as tax strategy.

In this session we will:

- Provide you with an arm's length approach to pricing intra-group loans, cash pools and guarantees
- Provide a practical case study on determining interest rates on intra-group loans
- Highlight common pitfalls and how to avoid them
- Give insight into developing a financing policy with the relevant stakeholders

Who is this session of interest to?

Tax, treasury and legal personnel engaged in tax and transfer pricing strategy, management and controversy.

Why attend?

Attendees will get an understanding of how various types of intra-group financing transactions should be approached. We will discuss the important principles emerging out from the guidance issued by OECD and UN, tax authorities and various case laws. We will also highlight the common pitfalls and how these can be avoided. Finally, we will focus on why a global financing policy is important and the roles played by various stakeholders in developing one. DLA Piper will discuss the issues and opportunities holistically with our multi-disciplinary team of

former government and policy advisors, economists, lawyers and former in-house tax professionals.

For more information please contact Samantha Thorpe.

PRÓXIMAS SESIONES

13 November 2019 Johannesburg

8:30 AM - 5:00 PM (UTC+02:00)

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