



Transfer Pricing Masterclass Series

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The DLA Piper Transfer Pricing Team recently presented a series of Transfer Pricing Masterclasses on a variety of topics.

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Knowing the issues: Identifying transfer pricing risk and opportunity

In this session we covered:

- How to understand tax authority audit triggers and the tax authority perspective in transfer pricing audits.
- Processes for evaluating global structures to manage risks and unlock opportunities.
- How to bring fresh eyes to your transfer pricing.

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Between the uprights: Valuations in tax and transfer pricing

In this session we covered:

- Valuation standards and why they are important.
- Methods to apply and when.
- Defending valuation assumptions under tax audit.

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Interested in interest: Financial transactions in transfer pricing

In this session we covered:

- An arm's length approach to pricing intra-group loans, cash pools and guarantees.
- Practical case studies on determining interest rates on intra-group loans.
- Common pitfalls and how to avoid them.
- Insight into developing a financing policy with the relevant stakeholders.

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Doing your duty: Transfer pricing, tax and beyond

In this session we covered:

- The importance of intragroup legal agreements.
- · Corporate and IP law, directors duties and regulatory considerations in tax and transfer pricing.
- Indirect tax, PE, WHT, beneficial ownership and other tax considerations.

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Landing the Value: Centralized controversy management for Transfer Pricing

In this session we covered:

- How to set the global transfer pricing controversy strategy.
- Tools to help you proactively preparing for controversy.
- · How to ensure consistent messaging globally.

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For more information, please contact a member of our International Transfer Pricing Team.

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