



**TRANSFER PRICING
UPDATES –
HOW TO COPE WITH A
RAPIDLY CHANGING
LANDSCAPE?**

TAXAND

YOUR GLOBAL TAX PARTNER

**WE ARE A WORLD
LEADING PROVIDER OF
TAX SERVICES WITH
OVER 2,500 TAX
ADVISORS IN 50
COUNTRIES**

**GREAT BRITAIN –
CYPRUS BUSINESS
ASSOCIATION**

23 NOVEMBER 2021

Your global tax partner

AGENDA

1. Timeline
2. Cyprus: Transfer Pricing Rules
3. About Taxand

1 - TIMELINE

BEPS Reports

Final Reports 15 BEPS Actions.

Oct 2015

Jun 2017

Feb 2020

BEPS 2.0

The BEPS 2.0 was introduced, including the Blueprint on Pillar I and Pillar II.

Oct 2020

Dec 2020

TP Documentation draft bill submitted to Cyprus Parliament

June 2021

Sept 2021

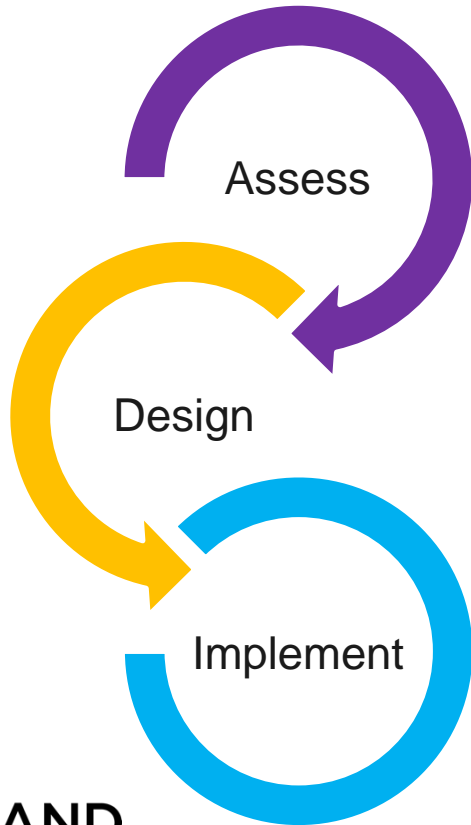
Intra-group TP Financing Circular

Introduced in Cyprus, aligned with the EU Comm. and same wording as Luxembourg

Guidance on the TP implications of the COVID-19 pandemic

Public CbCR adopted by the EU Council

2 – CYPRUS: TRANSFER PRICING RULES



OECD three-tier structure: Master File / Local File / Country-by-Country Reporting

TP and substance: Document actual decision-making process vs. formal allocation of tasks – coherence. Quantify necessary financial capacity.

Proper **TP documentation** and **regular reviews** to consider structure changes (additional personnel hired or shifted within the group? Additional functions performed? Impact on current TP model)

Non-compliance risks: double taxation, penalties, denial of tax deductions, upwards adjustment of profits, recharacterization of transactions,

ABOUT TAXAND



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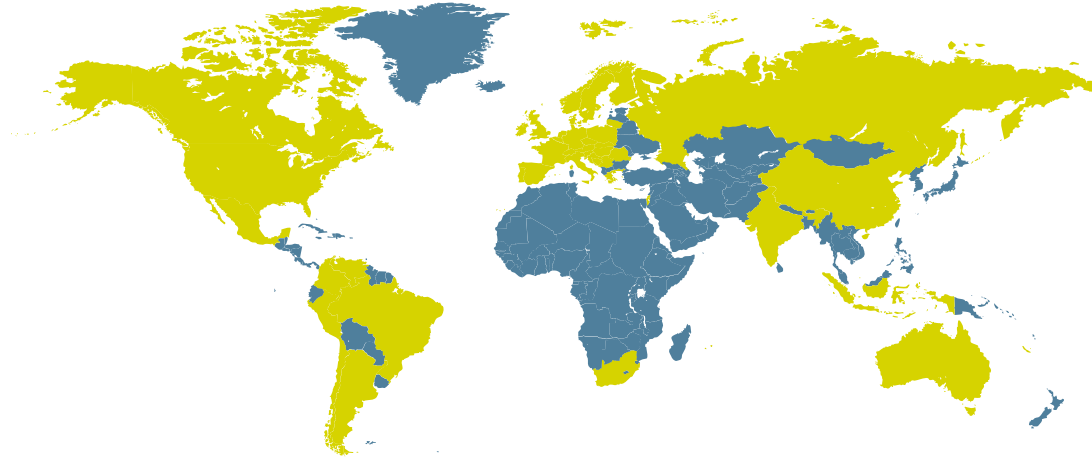


Taxand provides high quality, integrated tax advice worldwide. Our tax professionals, more than 550 tax partners and over 2,500 tax advisors in 50 countries - grasp both the fine points of tax and the broader strategic implications, helping you mitigate risk, manage your tax burden and drive the performance of your business.

We're passionate about tax. We collaborate and share knowledge, capitalising on our expertise to provide you with high quality, tailored advice that helps relieve the pressures associated with making complex tax decisions.

We're also independent- ensuring that you adhere both to best practice and to tax law and that we remain free from time consuming, audit based conflict checks. This enables us to deliver practical advice, responsively.

GLOBAL COVERAGE



Argentina	Cyprus	Ireland	Netherlands	Singapore
Australia	Czech Republic	Israel	Norway	Slovakia
Austria	Denmark	Italy	Peru	Slovenia
Belgium	Finland	Japan	Philippines	South Africa
Brazil	France	Korea	Poland	Spain
Canada	Germany	Luxembourg	Portugal	Sweden
Chile	Greece	Malaysia	Puerto Rico	Switzerland
China	Hungary	Malta	Romania	UK
Colombia	India	Mauritius	Russia	USA
Croatia	Indonesia	Mexico	Serbia	Venezuela

OUR GLOBAL SERVICE COMMITMENT



- ❖ Providing high quality advice that addresses your strategic concerns and improves your bottom line by:
 - Understanding and managing the tax consequences of cross-border tax transactions
 - Considering organisational (re)structuring options in full awareness of the tax implications
 - Realising tax, supply chain and overall operational efficiencies
 - Interpreting technical tax provisions
 - Lowering effective tax rates
 - Addressing and preventing tax leakages
 - Ensuring tax compliance
 - Managing relationships with tax authorities

Thank you ! – Please reach out



Tax Partner

Gaspar Lopes Dias, Taxand Cyprus

T: +44 79 2321 5439 | E: glopesdias@cy.taxand.com

Gaspar has experience in a broad range of transfer pricing and international tax matters including financial operations, business reorganisations and IP structuring, advising multinationals in various industries and investment funds.

He joined Taxand Cyprus in 2021 from the tax practice of Baker & McKenzie in London, having previously worked at Loyens & Loeff in Luxembourg, and KPMG Belgium.

Gaspar holds an LL.B civil law (Nova University Lisbon), LL.M International Tax (Tilburg University), MSc Taxation (University of Oxford), ADIT member UK CIOT, and is an IFA member (UK Branch).

Some of his titles include:

- LOPES DIAS, Gaspar, Chapter 22: Luxembourg in Implementing Key BEPS Actions: Where Do We Stand? – peer reviewed book following the 2017 Rust Conference, IBFD, WU Tax Law and Policy Series, vol. 12, Dec. 2019.
- LOPES DIAS, Gaspar, The concept of Debt-Claim as the Key Distinguishing Factor between Dividend and Interest Income in the OECD MC, IBFD Vol. 17 Deriv. & Fin. Inst., Issue 2, Feb. 2015.
- [BOOK] LOPES DIAS, Gaspar, Tax Arbitrage through Cross-Border Financial Engineering, Kluwer Law International, Series on International Taxation No. 50, Feb. 2015.