

Intercompany Transactions, Anti-Avoidance Risks & Sector-Specific Challenges

7 – 11 June 2027
Lyon (France)

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A photograph of chess pieces on a checkered board. In the foreground, a large, ornate gold king piece stands prominently. To its left, a smaller silver pawn is visible. Further back, another silver pawn is positioned. The background features a series of concentric, light gray circles that create a sense of depth and focus on the king piece.

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Introduction

In today's global business world, intercompany transactions are a key issue that requires a deep understanding of pricing practices, risk management, and tax avoidance strategies, especially with sector-specific challenges. Intercompany transactions have become more complex with the rise of intricate business models and multinational operations. This course aims to explore the critical aspects of intercompany transactions, the risks of tax avoidance, and the challenges specific to different sectors, along with best practices for addressing them.

Throughout this course, participants will gain insights into managing the risks associated with tax avoidance in intercompany transactions and how to address sector-specific challenges through a comprehensive understanding of relevant regulatory frameworks. Participants will also learn best practices for ensuring compliance with both local and international tax laws.

Course Objectives

- **Understanding Intercompany Transactions:** Learn the fundamentals of intercompany transactions and their impact on business operations.
- **Managing Anti-Avoidance Risks:** Identify tax avoidance risks and explore strategies to mitigate them.
- **Sector-Specific Challenges:** Gain knowledge on challenges faced by different industries when managing intercompany transactions.
- **Best Practices for Compliance:** Understand the key elements of compliance with local and international tax regulations.
- **Risk Mitigation Strategies:** Develop effective strategies for reducing legal and financial risks arising from intercompany transactions.

Course Outlines

Day 1: Introduction to Intercompany Transactions

A graphic of a chessboard with several chess pieces (a king, a queen, a rook, and a pawn) in gold and silver. The text 'UK Training' is in a small, black sans-serif font, and 'PARTNER' is in a large, bold, black sans-serif font below it.

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- Defining Intercompany Transactions and Their Importance
 - Overview of intercompany transactions in global business.
 - The impact of intercompany transactions on financial statements and tax reporting.
 - The significance of pricing intercompany transactions in business strategy.
- Types of Intercompany Transactions
 - Commercial transactions and tax penalties.
 - Financial transactions and their impact on economic outcomes.
 - Legal and regulatory aspects of intercompany transactions.

Day 2: Anti-Avoidance Risks in Intercompany Transactions

- Understanding Tax Avoidance
 - What constitutes tax avoidance, and how it manifests in intercompany transactions.
 - Common methods of tax avoidance in intercompany arrangements.
 - The consequences of tax avoidance for businesses and economies.
- Managing Anti-Avoidance Risks
 - Identifying tax avoidance risks and how to address them.
 - Tools and techniques for minimizing tax avoidance in intercompany transactions.
 - Aligning with both local and international regulations on tax avoidance.

Day 3: Sector-Specific Challenges in Intercompany Transactions

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- Sectoral Challenges in Intercompany Transactions
 - Sector-specific challenges faced by industries such as energy, technology, manufacturing, and financial services.
 - How regulations vary across sectors and impact intercompany pricing strategies.
 - The effects of intercompany transactions on business operations in various industries.
- Best Practices for Addressing Sector-Specific Challenges
 - Effective strategies for managing intercompany transactions in different industries.
 - Case studies from various sectors to highlight common challenges and solutions.

Day 4: Compliance with International and Local Tax Regulations

- Tax Compliance in Intercompany Transactions
 - Local and international tax regulations regarding intercompany transactions.
 - Understanding the compliance requirements for cross-border intercompany dealings.
 - The importance of tax reporting and compliance with diverse legal frameworks.
- Global Guidelines for Tax Compliance
 - The role of international organizations like OECD in regulating intercompany transactions.
 - The importance of tax reporting in cross-border intercompany transactions.
 - How to avoid penalties and sanctions for non-compliance.

Day 5: Risk Mitigation Strategies and Avoiding Tax Evasion

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- Developing Risk Mitigation Strategies for Intercompany Transactions
 - How to develop reasonable pricing policies for intercompany transactions.
 - The role of internal auditing and compliance in reducing risks.
 - The use of technological tools to manage tax risks effectively.
- Continuous Risk Assessment and Compliance Monitoring
 - Methods for ongoing risk assessment and ensuring tax compliance.
 - Utilizing modern technologies for enhancing compliance and reducing risks.
- Course Recap and Conclusion
 - A summary of the key points covered in the course.
 - Q&A session to clarify any concepts or real-life applications.

Why Attend This Course: Wins & Losses!

- Wins in Intercompany Transactions: Learn how to manage intercompany transactions effectively in compliance with tax laws.
- Wins in Anti-Avoidance Risk Management: Develop the skills to identify and mitigate tax avoidance risks in intercompany transactions.
- Avoid Losses in Compliance: Gain the tools to ensure compliance with both local and international tax regulations, reducing the risk of penalties.
- Strategic Advantage: Understand sector-specific challenges and how to address them effectively, gaining a competitive edge in global business.

Conclusion

By the end of this course, participants will have acquired a comprehensive understanding of intercompany transactions, including how to manage risks related to tax avoidance, ensure compliance, and address the sector-specific challenges that arise in business operations. The skills gained in this course will help participants navigate the complexities of intercompany transactions and contribute to their organization's financial success and legal compliance.

We look forward to helping you enhance your skills and provide effective solutions for handling intercompany transactions and anti-avoidance risks.

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