



# Transfer Pricing services

Tax Services

January 2020

---

[kpmg.com.cy](http://kpmg.com.cy)



# Better transfer pricing solutions for your business

In the post-BEPS world, the demand for substance and transparency is higher than ever before.

Multinational enterprises are expected to disclose as much information on their value creation and profit allocation as

possible. In this respect, robust transfer pricing policies and procedures are vital for successful international businesses.

Leveraging our global reach, we can assist you to comply with the Cyprus transfer pricing rules, taking into consideration

the respective rules that apply in foreign jurisdictions.

We can provide a holistic range of compliance and business planning transfer pricing services, as outlined below.

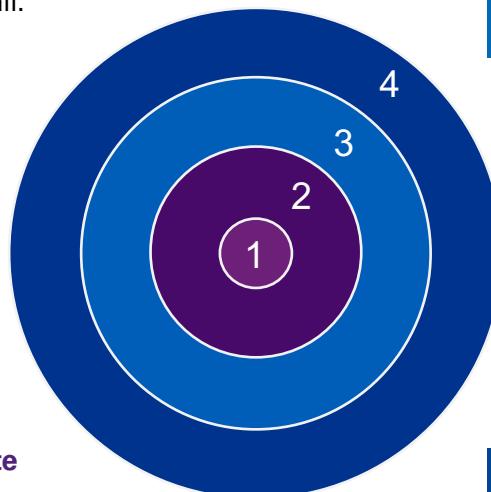
## Transfer pricing lifecycle:

### 1 – Plan

We can assist in the development of economically sustainable transfer pricing policies. Remember, nobody plans to fail. They simply fail to plan.

### 3 – Comply and Document

We can assist with the analysis and documentation of intra-group transactions, for consistency with the arm's length principle and local statutory requirements.



### 2 – Implement and Operate

We can assist in the development and implementation of procedures and systems for setting, monitoring and documenting intra-group transactions.

### 4 – Resolve Disputes

We can assist in resolving transfer pricing disputes or help you avoid them altogether, through advance tax rulings



# 49%

of leaders in charge of tax policy and operations assess transfer pricing software as one of the key technology investments today and in the next 5 years.

## Transfer pricing landscape

Whether you are an ultimate parent entity for a multinational group or a local subsidiary – recent transfer pricing developments will invariably influence your tax obligations over the next decade. Post-BEPS developments, digital tax discussions, new modified nexus rules are among recent trends that shape the international transfer pricing landscape. Cyprus is not an exception.

There is no time to “wait and see”. Companies not taking proactive steps today may face themselves with missed opportunities, bigger risks and greater transfer pricing exposure tomorrow.

## Why KPMG in Cyprus?

Our core differentiator is a transfer pricing team of professionals with diverse backgrounds and international experience, which will give you a customised solution to your transfer pricing issues.

Our team is ready to help with whatever you need, whenever you need it. Here is how we can assist you:

- We can help you comply with Cypriot transfer pricing requirements applicable to your business. This will give you certainty and will save you time.
- We can develop and help you implement transfer pricing policies. This will make your intra-group transactions more transparent and efficient.
- We can give you regular insights into what is expected within the transfer pricing environment, keeping you up to date and ahead of your competition.

Here at KPMG we are committed to bring something valuable: **certainty to your transfer pricing business.**

# 60%

of economic and commercial activity taking place globally is between related parties

**“Ask any tax vice president what is the biggest issue on their agenda and 99 percent of them will say it’s transfer pricing.”**

– Jeffrey Owens, ex Head of Centre for Tax Policy and Administration at the OECD

For any further information you may contact:

**George Markides**  
Board Member, Head of Tax  
**T:** +357 22 209 240  
**E:** gmarkides@kpmg.com

**Costas Markides**  
Board Member, Primary contact  
**T:** +357 22 209 246  
**E:** cmarkides@kpmg.com

**Katerina Papanicolaou**  
Board Member  
**T:** +357 22 209 149  
**E:** kpapanicolaou@kpmg.com

**Michael Halios**  
Board Member  
**T:** +357 24 200 222  
**E:** mhalios@kpmg.com

**Volodymyr Serdechniuk**  
Manager, Transfer Pricing  
**T:** +357 22 207 425  
**E:** serdechniukv@kpmg.com

# Contact us

## **Nicosia**

**T:** +357 22 209 000  
**F:** +357 22 678 200  
**E:** [nicosia@kpmg.com.cy](mailto:nicosia@kpmg.com.cy)

## **Limassol**

**T:** +357 25 869 000  
**F:** +357 25 363 842  
**E:** [limassol@kpmg.com.cy](mailto:limassol@kpmg.com.cy)

## **Larnaca**

**T:** +357 24 200 000  
**F:** +357 24 200 200  
**E:** [larnaca@kpmg.com.cy](mailto:larnaca@kpmg.com.cy)

## **Paralimni**

**T:** +357 23 820 080  
**F:** +357 23 820 084  
**E:** [paralimni@kpmg.com.cy](mailto:paralimni@kpmg.com.cy)

## **Paphos**

**T:** +357 26 943 050  
**F:** +357 26 943 062  
**E:** [paphos@kpmg.com.cy](mailto:paphos@kpmg.com.cy)

## **Polis Chrysochous**

**T:** +357 26 322 098  
**F:** +357 26 322 722  
**E:** [paphos@kpmg.com.cy](mailto:paphos@kpmg.com.cy)

[www.kpmg.com.cy](http://www.kpmg.com.cy)



©2020 KPMG Limited, a Cyprus limited liability company and a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity. All rights reserved. Printed in Cyprus.

KPMG and the KPMG logo are registered trademarks of KPMG International Cooperative ("KPMG International") a Swiss entity.

The information contained herein is of a general nature and is not intended to address the circumstances of any particular individual or entity. Although we endeavor to provide accurate and timely information, there can be no guarantee that such information is accurate as of the date it is received or that it will continue to be accurate in the future. No one should act upon such information without appropriate professional advice after a thorough examination of the particular situation.

The views and opinions expressed herein are those of the author and do not necessarily represent the views and opinions of KPMG International Cooperative ("KPMG International") or KPMG member firms.