

The Cyprus Fiduciary Association proudly presents:

Seminar 3 Transfer Pricing

Thursday, 15 April 2021 – Live Online

Featured Speakers



**Mr Demis
Ioannou**



**Mr Christos
Theophilou**



**Mr Gaspar
Lopedias**



**Mr Costas
Savva**

#CYFAseminars2021

*The Seminar will be conducted in the English Language
Participants will receive a Certificate of Attendance for
4 CPD Unit Hours.*

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Seminar Aims and Objectives

The Cyprus Fiduciary Association (www.cyfa.org.cy) is organizing one (1) half-day (4-hour) live online seminar titled “**Transfer Pricing**”.

Transfer pricing deserves to be a top-of-mind priority. The OECD, United Nations, European Union and individual countries have changed and keep changing their guidance in the field of transfer pricing due to the BEPS Project. The new guidance can be considered a game changer and is expected to alter the transfer pricing outcomes in many situations. This requires a different approach from both tax authorities and multinational enterprises. A significantly more granular risk and functional analysis should be performed. Companies as well as tax authorities need to have a better understanding of how value is created with respect to the development and exploitation of their intangibles. A further point of focus is the way in which companies and tax authorities should deal with the three-tiered OECD approach related to transfer pricing documentation.

By the end of the seminar the participants will be able to deal with all developments in the field of transfer pricing properly, and to fully understand the transfer pricing principles and methodologies and their practical application. This 4-hour tax training course introduces participants to such principles and methodologies and then covers their application to specific categories of intra-group dealings.

Programme

| 08:30 – 09:00 | Registration | Speaker |
|---------------|--|---------------------|
| 09:00 – 10:00 | <ul style="list-style-type: none"> Introduction to Transfer Pricing (Comparability Analysis & Transfer Pricing Methods) | Demis Ioannou |
| 10:00 – 10:10 | Break | |
| 10:10 – 11:10 | <ul style="list-style-type: none"> Intra-Group Services | Christos Theophilou |
| 11:10 – 11:20 | Break | |
| 11:20 – 12:20 | <ul style="list-style-type: none"> Transfer Pricing and Intangibles | Gaspar Lopedias |
| 12:20 – 12:30 | Break | |
| 12:30 – 13:30 | <ul style="list-style-type: none"> Intra-Group Finance Transactions (focusing on intra-group loans) | Costas Savva |
| 13:30 – 13:45 | Q &A Session | |

The seminar is addressed primarily to all interested professionals that are involved in structuring, taxation and management of companies.

To receive a certificate of attendance, each registered participant must login and attend the full duration of the live-online seminar. Participants should also complete the relevant evaluation form.

The seminar will be recorded for internal use purposes.

For registrations, please complete and sign the registration form and submit to the Cyprus Fiduciary Association e-mail address info@cyfa.org.cy by **Monday, 12 April 2021**.

Click [here](#) to review the CYFA Payment & Refund policy.

Speakers' Short Bios

Christos Theophilou | Tax Partner at Taxand Cyprus

Christos specialises in private clients and corporate tax issues (including transfer pricing) with an international dimension, such as private equity structuring, cross-border investments, structured finance, IP structuring and international trade.

Christos received his Master of Laws (MSc) in Tax Law from Oxford University. He was trained from a Big4 company and holds a Bachelor's degree in Economics, the Advanced Diploma in International Taxation (ADIT) of the UK Chartered Institute of Taxation, as well as being a qualified Chartered Accountant in England & Wales. He is currently an LLB candidate (final year) at Frederick University Cyprus. Christos is a contributor to international tax publications such as IBFD, Tax Notes International, Bloomberg BNA, International Tax Review and IFA as a national reporter. Furthermore, Christos is currently a member of the Tax Policy and Strategy committee of Institute of Certified Public Accountants of Cyprus.

Christos is also a freelance lecturer for Tolley's (LexisNexis) in Greece, Cyprus and Ukraine, where his main areas are ADIT Paper 1 Principles of International Tax. Christos is a well-known personality in the tax world, where he is a regular speaker at a wide range of conferences.

Demis Ioannou | Tax Partner at Taxand Cyprus

Demis specialises in corporate income tax law, transfer pricing and international tax (treaty) law. He has a strong track record with clients in advising on transfer pricing issues and in complex corporate tax law issues. His extensive interest on comparative income tax law (US, UK, Canada and Australia) offers him a unique advantage in solving complex tax issues in Cyprus.

Demis received his Master of Laws (MSc) in Tax Law from Oxford University. He was trained from a Big4 company and holds a first-class Bachelor's degree in Accounting and Finance from the UK, as well as being a qualified Chartered Accountant in England & Wales. He is currently an LLB candidate (final year) at Frederick University Cyprus.

Demis' dissertation in Oxford focuses on analysing the OECD BEPS Project and was supervised by Richard Collier a senior tax advisor of the OECD on transfer pricing issues. In addition, he published a paper for the Cambridge Tax Law History Conference edited by Professor Peter Harris (University of Cambridge) on income tax fundamentals and the origins of the Cypriot income tax law. Demis is a co-representative for IFA (YIN) in Cyprus.

Costas Savva | Tax Partner at Taxand Cyprus

Costas has considerable experience in advising on international tax law and corporate tax issues. He focuses his practice on the tax aspects of inbound and outbound business operations with a strong track record in cross-border investment structures and structured finance. Costas also specializes in Transfer Pricing, with experience in a broad range of transfer pricing matters. He advises on financial transactions (e.g., cash pool, debt pricing) and intragroup services.

Costas holds an LL.B. from Frederick University and a Master of Laws (LL.M.) in International Taxation from the Vienna University of Economics and Business (WU) in Austria. He is a qualified fellow member of the Association of Certified Chartered Accountants (ACCA) and a member of the Institute of Certified Public Accountants of Cyprus (ICPAC). He was trained by KPMG Cyprus, where he later served as a senior manager at the Nicosia office.

Costas serves as the Cypriot correspondent of the IBFD holding regime. He is also the co-author of the book *Limiting Base Erosion* edited by Professor Michael Lang. He regularly publishes on a wide variety of tax topics.

Gaspar Lopes Dias | Partner at Taxand Cyprus

Specialises in Transfer Pricing and International Tax, LL.B (civil law), LL.M in international tax (U. Tilburg), ADIT, MSc Taxation (University of Oxford).

Gaspar specialises in international taxation, transfer pricing, financial operations and alternative capital. Gaspar advises multinationals as well as investment funds on financial transactions and on intra-group services. Gaspar Joined Taxand Cyprus from the tax practice of Baker & McKenzie in London, having previously worked at Loyens & Loeff in Luxembourg, and KPMG Belgium. Gaspar has industry experience and in a broad range of transfer pricing matters, including business reorganisations and IP structuring.

Full CVs attached.