



The Institute of Certified Public Accountants of Cyprus (ICPAC)

Agenda for webinar

“Financial Transactions: Taxation of Interest Under Cyprus Tax Law (e.g. NID, Transfer Pricing), Tax Treaties and EU Tax Law”

Time / Duration	Session
9:00 - 10:00	▪ Overview of Financing Models ▪ Taxation of interest income under domestic law
10:00 - 10:10	Screen Break
10:10 - 11:10	Tax Treaty Aspects of Interest and Tax Treaty Abuse ▪ Allocation of Taxing Rights – OECD Model Article 11(1) ▪ Meaning of “interest” and overlapping between articles 7, 11 ▪ PPT/Beneficial ownership and royalties ▪ Anti-avoidance provision on special tax regimes (e.g. NID) ▪ Transfer pricing and interest (Excessive interest payments)
11:10 - 11:20	Screen Break
11:20 - 12:20	Taxation of cross-border interest payments in the European Tax Union ▪ Council Directive, 2003/49/EC of 3 June 2003 on a common system of taxation applicable to interest and royalty payments made between associated companies of different Member States ▪ ATAD
12:20 - 12:30	Screen Break
12:30 - 13:30	Transfer Pricing Aspects of Financial Transactions Tax Planning ▪ Intra-group Loans ▪ Financial Guarantees ▪ Cash Pooling



Duration of Day: 4,5 hours (breaks included) corresponding to **4 CPDs**

Instructor:

Christos Theophilou | Tax Partner | International Tax & Transfer Pricing, STI Taxand
BSc (Econ.), FCA, ADIT, MSc Tax Law (Oxon), LLB Law (Hons)