



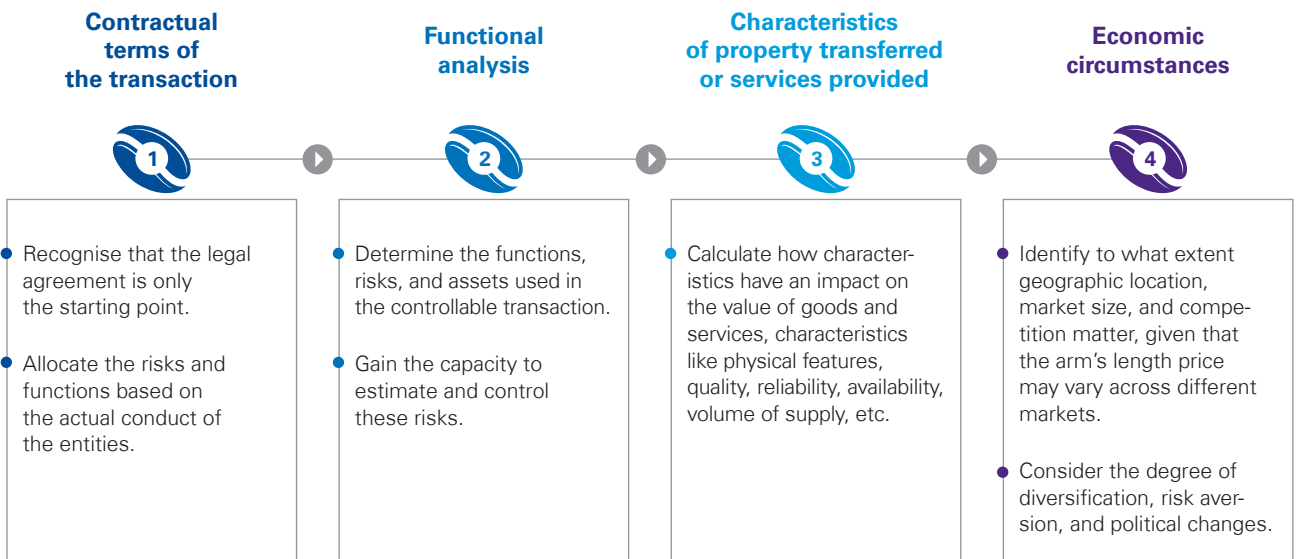
# Transfer pricing: intragroup financing services



A bespoke service catering to all types of alternative investments

## We can help you get your transfer pricing documentation aligned with the highest standards.

- Our reports are in line with the recently published Article 56bis Luxembourg Income Tax Law, which stresses that:
  - the economic rationale for all intercompany transactions must be documented
  - all intercompany transactions must be seen in the context of a wider value chain analysis



### Key points

- Economic rationale matters (e.g. contractual terms should be realistic).
- Transfer pricing should be explained in the wider context of the whole value chain.
- A contract is not enough → the actual behavior of the related entities is what matters.

## Financing companies: we can help you comply with the new transfer pricing circular.

### Our service offers you:

- help navigating through the new requirements
- the ability to meet challenges around beneficial ownership and withholding tax, in particular in the areas of:
  - **economic substance:** equity requirements have changed; thus, equity positions for financing purposes may need to be revisited
  - **organisational substance:** it needs to be shown the Luxembourg-resident board members actively participate in the decision-making process and are qualified to exercise their responsibilities

## We can guide you through the new transfer pricing requirements, which concern three areas in particular:



Board



Employee  
and office



Equity

For contact details please go to: [www.kpmg.lu/alternativeinvestments](http://www.kpmg.lu/alternativeinvestments)



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