



## **Deloitte School of Tax & Legal** Tax Considerations when Expanding Cross Border – A Case Study: Export and Branch/Subsidiary

Doing business cross border creates a number of business and tax issues, which are often very complex and interrelated.

This workshop has been designed as a basic introduction to some of these key business and tax issues that businesses need to consider when expanding cross border. The focus of this workshop is on outbound transactions.

The foundation for the workshop is a case study that follows a mid-sized company going through a period of growth outside of South Africa to become a multi-national company (“MNC”). Participants enrolled for the workshop will be emailed the short background to the case study two days before the session is held, and will have a chance to familiarise themselves with the background ahead of the session should they wish to do so.

In order to understand the possible tax implications related to cross border transactions, it is vitally important to first be clear on the various business flows that are cross border, which in turn trigger the various tax implications to consider and plan for. In this respect, the workshop and case study focus on the following business flows:

1. Flows of goods and services (which trigger VAT, customs, excise and transfer pricing etc.)
2. Flows of finance
3. Flows of intangibles
4. People flows (global mobility, employees' tax)
5. Flows of intra-group services

For each of these business flows, we will discuss and apply the related tax implications, through discussion and in the case study which will be broken into two modules, with the following learning objectives:

### **Module 1: Exporting (step one of the expansion)**

At the end of this module of the case study participants will be able to:

- Identify the key direct, indirect and transfer pricing issues to be considered by a domestic entity seeking to export its manufactured products overseas;
- Explain the direct, indirect and transfer pricing issues to be considered with respect to sales through an independent agent; and
- Explain the direct, indirect and transfer pricing issues to be considered with regards to training, technical support services, warranties and servicing.

### **Module 2: Manufacturing or licensing to manufacture cross border (step two of the expansion)**

At the end of this module of the case study participants will be able to:

- Identify the key direct, indirect and transfer pricing issues to be considered by a domestic entity seeking to expand its manufacturing operations into countries beyond its own jurisdiction; and
- Identify the key direct, indirect and transfer pricing issues to be considered by a domestic entity seeking to expand its operations in such areas as R&D, sales and distribution, provision of services, management and financing into countries beyond its own jurisdiction.

The workshop will touch on the basic and key, VAT, Customs, Employees tax, Income tax, Withholding tax, Double Tax Agreement, Transfer Pricing, Country by Country Reporting requirements and Exchange Control principles relevant to the case study material covered.

The course is designed to be **introductory in nature** and to create an awareness of key issues to consider and conclude on. The session will also serve as a useful introduction to the area of cross border taxation for team members new to the cross border environment or who are not experts on the topic but would benefit from gaining some background knowledge.

Participants will be provided with a short Guide that will cover certain of the key issues to be covered in the session, as well as a checklist of questions to ask and consider when embarking on cross border transactions.

Where considered relevant, we will include a discussion on recent legislative amendments impacting cross-border transactions.

Facilitator:

**Catherine Wright** is a Manager in the Deloitte School of Tax team. Catherine's focus is corporate and international tax. She has a Master's Degree in Taxation from the University of Pretoria. Catherine regularly coordinates and presents tax technical training to Deloitte clients and Deloitte staff.

Dates and Venues:

Johannesburg	16 October 2018
Durban	17 October 2018
Cape Town	19 October 2018
Port Elizabeth	23 October 2018

Cost:

R1 794 (inclusive of VAT)/R1 560 (exclusive of VAT)

Payment is due after the seminar date.

Company Discount: 10% for 2 or more participants from the same company and region. The discount applies from participant 2 onwards.

Alumni Discount: 10% for Deloitte alumni. This applies if you are a former employee of Deloitte and have registered as Deloitte alumni. (Click here to register as an alumnus)  
You will only qualify for one of the 10% discounts

Cancellation Policy:

Our standard cancellation policy is to invoice 50% of the cost of the workshop for attendance not cancelled within 2 business days from the date of the workshop. This is to recover the overhead costs incurred relating to your planned attendance and the cost of the course material.

Time:

**8:30 a.m. – 12:30 p.m.**

(Registration from 8:00)

The course will contribute to **4** hours CPD/CPE

RSVP:

Please note that we use an online booking system. Kindly complete the online booking form using the link below.

The link will open the booking page of the Deloitte School of Tax but it will not select the course or region for you. Please be sure to select the correct course, date and region from the drop-down menu.

You will be able to register several people using one form. (Please contact us at dsot@deloitte.co.za if you wish to make bookings for more than 20 people at once.)

[Register Here](#)

## Course Material:

In the interests of the environment, and to move with technology, this will be a paperless course. We will email you the course material within 2 business days of the planned session date. You will then have the option to bring the course material on your laptop/tablet, or should you prefer, to print the material. We will have plug points in the venues for laptops/tablets.

## Contact us:

Should you have any administrative questions regarding this workshop, please contact us at [dsot@deloitte.co.za](mailto:dsot@deloitte.co.za)

Deloitte School of Tax & Legal Website

Sincerely,

The Deloitte School of Tax & Legal Team



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