

Business disruptions and transfer pricing

Can / should the current **transfer pricing policy** be maintained?

- ▶ Does a crisis-related deviation have an impact on the system in the future?
- ▶ Impact on existing APAs (critical assumptions)

How can you manage your **cash flow** today to stimulate growth tomorrow?

- ▶ Increase of cash pool resources
- ▶ Intra-group factoring
- ▶ Intra-group guarantees and letters of comfort
- ▶ Extension of payment terms

Do I have the right **substance** in the right place?

- ▶ Stress test of significant people functions assumptions due to remote working
- ▶ Has the decision-making process during the crisis confirmed the functional and risk profile?

Do I restructure my **supply chain**?

- ▶ Allocation of closure costs
- ▶ Exit taxation
- ▶ Loss utilization

Should **agreements** be amended?

- ▶ Assess third party conduct in amending/terminating agreements during downturn
- ▶ Do I need to later on (gradually) reverse temporary changes?

