Italy vs SATA Sud S.p.A.

Resource Number: RS030/2026

Resource Details

Country	Global	**Group**	Transfer Pricing
Category	Arm’s Length Principle	**Sub-Category**	Case Law on lack of documentation
Written By	CA Priyanka Bansal	**Designation**	Taxation Manager
Effective Date	2026-04-21		
Short Brief	This case relates to the disallowance of intra-group service deductions by the Italian Revenue Agency against SATA Sud S.p.A. for lack of sufficient documentation. The Supreme Court held that generic invoices and a flat-rate framework contract alone are insufficient to prove deductibility, placing the burden of proof firmly on the taxpayer.		

Sections

Full Detailed Summary: Italy vs SATA Sud S.p.A.

SATA Sud S.p.A. (subsequently merged into SATA S.p.A.) was an Italian company operating as part of a corporate group. The group was headed by its parent company **F.C. s.r.l.**, which provided various intra-group services to SATA Sud under a formal service agreement.

Documents

• Full Detailed Summary: Italy vs SATA Sud S.p.A.

References

No references added.