

# Italy vs SATA Sud S.p.A.

Resource Number: RS030/2026

## Resource Details

<b>Country</b>	Global	<b>Group</b>	Transfer Pricing
<b>Category</b>	Arm's Length Principle	<b>Sub-Category</b>	Case Law on lack of documentation
<b>Written By</b>	CA Priyanka Bansal	<b>Designation</b>	Taxation Manager
<b>Effective Date</b>	2026-04-21		
<b>Short Brief</b>	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.