

IBFD International Tax Academy presents:

Introduction to Transfer Pricing

Acquire knowledge of the principles and concepts of transfer pricing

**Kuala Lumpur
7 & 8 July
2008**

Highlights

- Gain an understanding of the most important transfer pricing concepts and methods.
- Identify the various administrative approaches to avoiding and resolving transfer pricing disputes.
- Learn about intra-group services and cost sharing and valuation of intangibles.
- Highly acclaimed course instructors with academic and international practice backgrounds.
- Opportunity to meet and network with other professionals from across the world.
- Interactive structure with a maximum of 45 participants.
- Qualifies for 13.5 Continuing Professional Education (CPE) credits.

www.ibfd.org

IBFD International Tax Academy

Course

Introduction to Transfer Pricing

Why participate?

The course aims to provide participants with an introduction to the most important principles of transfer pricing. By attending the course, participants will acquire a good understanding of transfer pricing rules, methodology and practical application.

Participation is of benefit to:

- finance and tax personnel of multinational enterprises;
- tax accountants, economists and lawyers;
- in-house tax managers;
- tax and transfer pricing advisers; and
- government officials and tax inspectors.

Continuing Professional Education

This course qualifies for Continuing Professional Education (CPE) credits with:

- The UK Chartered Institute of Taxation;
- De Nederlandse Federatie van Belastingadviseurs;
- The Institute of Taxation in Ireland;
- The National Association of State Boards of Accountancy; and
- Malaysian professional bodies (for details, contact ITA).

It should be noted that this course may also qualify for CPE credits pursuant to the rules of a number of professional associations other than those listed above. Participants are encouraged to check with their professional associations to determine eligibility in this respect.

The IBFD International Tax Academy is registered with the National Association of State Boards of Accountancy (NASBA), as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN, 37219-2417.

Website: www.nasba.org

Recommended CPE points for this course: 13.5

(in accordance with the standards of the National Registry of CPE points, CPE credits are granted on a 50-minute hour).

Interactive course

To safeguard the interactive nature of the course, including group discussions and case studies, a maximum of 50 participants will be accepted. Early registration is therefore recommended.

Venue

Hotel Maya – Kuala Lumpur, Malaysia. Hotel Maya is a 5-star hotel featuring spacious rooms, spa, trendy food & beverage outlets and many handy facilities adding on to the total experience. With its resort-type environment, Hotel Maya sets a new benchmark for a unique yet pleasant experience. Hotel Maya is located in the hub of the business and commercial districts adjacent to Kuala Lumpur's famous Petronas Twin Towers. For further details, please go to www.hotelmaya.com.my.

How to register

Simply fill in your details on the registration form included with this brochure and return it to us by post or fax. Alternatively, visit www.ibfd.org and register online.

Instructors

Giammarco Cottani, LLM cum laude in European and International Taxation at the European Tax College, Leuven, Belgium and Tilburg, the Netherlands, is a PhD candidate at LUISS University, Rome and is currently working as a Senior Research Associate in IBFD's Topicals Knowledge Group. Before joining IBFD, he worked for Cleary Gottlieb Steen & Hamilton and previously with another major Italian law and tax firm. His specialization was Italian and International taxation of corporate groups, M&A and stock offering plans. He obtained a university degree in law from LUISS University, Rome.

Arcotia Hatsidimitris is Head of IBFD's International Tax Academy, which was set up in 1989 and is now the largest international tax training centre in Europe. She previously worked for the Australian Taxation Office for over 20 years and in the Transfer Pricing Practice of CRA in Boston, United States. Ms Hatsidimitris has transfer pricing experience in relation to the Asia-Pacific region, North America and Europe and specializes in the preparation of comparability analyses and benchmarking studies. In addition to managing IBFD's training centres in Amsterdam and Malaysia she is also responsible for all international tax in-house courses conducted worldwide for MNEs, governments and advisory firms. During 2007 she taught on in-house transfer pricing courses for the tax authorities of Egypt, India, Nepal and Croatia. Ms Hatsidimitris is also a member of the IBFD Transfer Pricing Advisory Board and was the secretary for the "Transfer Pricing and Intangibles" subject at the IFA Congress Kyoto in 2007.

Kay Kimkana is a Senior Research Associate in IBFD's Asia Pacific Knowledge Group. Prior to joining IBFD, she worked for the tax practice of an international accounting firm where she was primarily involved in corporate taxation advisory work and transfer pricing, and also at a firm of chartered accountants in the United Kingdom.

SM Thanneermalai is a Senior Executive Director in the Tax and Business Consulting Services division of PricewaterhouseCoopers. He has more than 30 years of audit and tax experience in Malaysia, the United Kingdom and Singapore. He has extensive experience in tax advisory and consulting assignments covering areas such as financing arrangements, cross-border transactions, joint venture agreements and mergers and acquisitions. Mr Thanneermalai is a member of the Institute of Chartered Accountants in England and Wales and a council member of the Malaysian Institute of Taxation. Currently he manages the transfer pricing, audit, investigation and the India Desk practice in PricewaterhouseCoopers Malaysia.

Suggested resources:

Transfer Pricing Database

The ultimate international transfer pricing reference source.

- Presents all the information available on transfer pricing in one database.
- Analysis and comparison of national approaches to transfer pricing.
- A large collection of relevant legislation and case law.
- Divided into country chapters offering in-depth surveys.
- Contains all the information from the *International Transfer Pricing Journal*.

Online: € 1,145 / \$ 1,470

Programme

The programme fee includes lunch, coffee, tea and light refreshments during breaks.

Day 1

- 08.30-09.00 **Registration**
- 09.00-09.15 **Welcome and IBFD Overview**
- 09.15-10.30 **Introduction to Transfer Pricing**
- OECD Transfer Pricing Guidelines for Multinational Enterprises
 - arm's length principle
 - Article 9 of the OECD MTC
 - Guidance for applying the arm's length principle
 - comparability analysis
 - functional analysis
 - use of the arm's length range
 - profit level indicators
 - use of multiple year data
 - losses
 - Sources of information
- 10.30-10.50 *Break – refreshments*
- 10.50-12.45 **Introduction to Transfer Pricing (continued)**
- 12.45-14.00 *Lunch*
- 14.00-15.20 **Transfer Pricing Methods**
- Transaction-based methods
 - comparable uncontrolled price (CUP)
 - cost-plus method
 - resale price method
 - Profit-based and other methods
 - profit split method
 - transactional net margin method (TNMM)
 - other methods
- 15.20-15.40 *Break – refreshments*
- 15.40-17.00 **Transfer Pricing Methods (continued)**

Day 2

- 09.00-10.30 **Administrative Approaches to Avoiding and Resolving Transfer Pricing Disputes**
- Economic double taxation
 - Burden of proof
 - Penalties
 - Corresponding adjustments and the mutual agreement procedure
 - Article 9 OECD MTC
 - Article 25 OECD MTC
 - Advance pricing arrangements
- 10.30-10.50 *Break – refreshments*
- 10.50-12.45 **Intra-Group Services and Cost Sharing and Valuation of Intangibles**
- Introduction
 - Types of intra-group services or common activities
 - Common structures for service provision
 - Service regulations
 - Transfer pricing methods
 - Service charge computation
 - Documentation
 - Cost sharing arrangements
 - Valuation of intangibles
- 12.45-14.00 *Lunch*
- 14.00-15.20 **Intra-Group Services and Cost Sharing and Valuation of Intangibles (continued)**
- 15.20-15.40 *Break – refreshments*
- 15.40-17.00 **Documentation**
- Introduction
 - Contents of documentation file
 - Latest developments

Registration Information

About IBFD

Since its foundation in 1938, the International Bureau of Fiscal Documentation has developed into one of the most respected organizations studying and documenting international taxation systems and investment legislation. IBFD clients include Ministries of Finance, international corporations, legal and accountancy practices, banks, educational institutions and others who look to IBFD as a first-class source of information. As an independent, not-for-profit research foundation, IBFD always offers objective and unbiased information. A multilingual staff of approximately 50 tax experts from around 30 countries is based at IBFD's offices in Amsterdam, Kuala Lumpur and Washington DC. In addition, research is carried out internationally, with a network of tax specialists relaying information from all over the world.

IBFD International Tax Academy

Founded in 1989, the International Tax Academy (ITA) offers a wide range of courses on international taxation and organizes conferences on special topics. ITA is recognized worldwide as a reputable learning centre in the field of international taxation, drawing on the expertise of internationally renowned specialists and IBFD's multinational research staff to provide a unique environment for the study of international tax law.

The open courses held by ITA are interactive and suitable for participants from all over the world. ITA also offers tailored in-house courses for corporate clients, tax administrations and other organizations and institutions. If you would like to discuss any aspect of our in-house courses, please contact Arcotia Hatsidimitris, Head of ITA, either at +31-20-554 0180 or e-mail A.Hatsidimitris@ibfd.org.

Member discount

IBFD members qualify for a 20% discount on the fees of all open courses held by the IBFD International Tax Academy. Companies with several offices, please note that – as with all membership offers – only staff based at the office that actually holds the membership, i.e. the address publications and correspondence are sent to, qualify for the 20% discount.

Accommodation

Participants are responsible for making their own arrangements. Details of suitable hotels will be sent to you upon registration.

Bank details

IBFD Asia Sdn. Bhd.
HSBC Bank Malaysia Berhad (Kuala Lumpur Main)
2 Leboh Ampang
50100 Kuala Lumpur
Malaysia
Account No. 101-350270-101

IBFD International Tax Academy (Head office)

P.O. Box 20237
1000 HE Amsterdam
The Netherlands
Tel.: +31-20-554 0160
Fax: +31-20-620 9397
E-mail: itacourses@ibfd.org
Website: www.ibfd.org

IBFD Asia-Pacific Office

Block B-19-5, Level 19
Northpoint Offices Midvalley City
1 Medan Syed Putra Utara
59200 Kuala Lumpur
Malaysia
Tel.: +603-2287 0709
E-mail: itacourses@ibfd.org
Website: www.ibfd.org

Registration Form

(please use block letters)

I would like to register for the course:

Introduction to Transfer Pricing

Date: 7 & 8 July 2008 Code: AP08TP1

Normal fee: MYR 3,456 / USD 1,080 Members' fee: MYR 2,765 / USD 864

Mr Mrs _____

(as it is to appear on your name badge)

First name _____

(as it is to appear on your name badge)

I have full IBFD membership (20% discount)

My membership number is _____

Organization _____

Job title _____

Address _____

City and postal code _____

Country _____

Telephone _____ Fax _____

E-mail _____

VAT No. _____

Signature _____

Date _____

(Please note that only signed forms can be processed)

Contact person responsible for training within your organization:

Name _____

Function _____

Telephone _____

E-mail _____

Method of payment

VISA Eurocard/MasterCard American Express

Card No. _____

Expiry date _____ Card validation code _____

(last three digits on the paper strip on the back of your card)

Cardholder name _____

Cardholder address _____

Bank transfer upon receipt of invoice

If the invoice address differs from the above, please indicate:

Organization _____

Attention to _____

Address _____

City and postal code _____

Country _____

Cancellation and other registration conditions

You may be prevented from attending a course due to unforeseen circumstances. If you notify us in writing of your cancellation at least 14 days prior to the event, no cancellation fee will be charged, except for an administration fee to cover the cost of processing the cancellation. If notification is received within 7 to 14 days before the event, a cancellation fee of 50% of the course fee will be charged. We regret that no refunds can be made if notice of cancellation is received less than 7 days before the event. An alternative participant may be substituted at any time without charge provided that IBFD Asia is informed in advance of the event. IBFD Asia reserves the right to cancel an event if there is an insufficient number of registrations, in which case our liability shall be restricted to a refund of any course fees paid to us. Cancellation notices will be sent at least 14 days in advance of the event. IBFD Asia also reserves the right to alter published programmes and speakers without notice.

On receipt of your registration

You will receive a confirmation letter and an invoice. Whenever possible we will use e-mail for correspondence in order to communicate effectively and quickly. Please contact us if you have not received the confirmation letter within 10 days of sending your registration form.

Please visit our website (www.ibfd.org) for full details of our booking information. For more detailed information about our courses or to register you can also call us at +603-2287 0709, e-mail itacourses@ibfd.org or visit our website at www.ibfd.org.



Please return the completed form by regular mail or fax to:

IBFD Asia

B-19-5, Level 19
Northpoint Offices, Midvalley City
1 Medan Syed Putra Utara
59200 Kuala Lumpur, Malaysia
Tel.: +603 2287 0709
Fax.: +603 2287 0729
E-mail: itakl@ibfd.org
Website: www.ibfd.org