

Transfer Pricing Workshop

Amsterdam, 7 - 8 June 2010

Day 1

08.30 - 09.00	Registration
09.00 - 09.20	Welcome and IBFD Overview
09.20 - 10:30	Introduction to the Case Study
10:30 - 10:50	Break
10:50 - 12:45	Case Study Part 1 - Intra-Group Services <ul style="list-style-type: none">• Management service fees• Identification of chargeable services• Service charge computation
12:45 - 14:00	Break - Lunch
14.00 - 15:20	Case Study Part 2 - Manufacturing and Distribution Activities <ul style="list-style-type: none">• Risk analysis• Functional analysis• Marketing intangibles• Methodology selection• Other pricing considerations
15:20 - 15.40	Break
15:40 - 17:00	Case Study Part 2 - Manufacturing and Distribution Activities <i>(continued)</i>

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Day 2

- 09:00 - 11:00 **Case Study Part 3 - Financial Activities**
- Risk analysis
 - Loan pricing policy
 - Guarantee fees
- 11:00 - 11:20 Break
- 11:20 - 12:45 **Case Study Part 4 - R&D Activities**
- Contract R&D
 - Royalty rate determination
 - Cost contribution arrangements
- 12:45 - 14:00 Break - Lunch
- 14:00 - 15:00 **Case Study Part 4 - R&D Activities** (*continued*)
- 15:00 - 15:20 Break
- 15:20 - 17:00 **Discussion: Dispute Prevention and Resolution**
- Documentation approaches and the use of APAs
 - Managing a transfer pricing review/audit
 - Resolving a transfer pricing dispute
 - Seeking corresponding adjustment
 - MAP
 - Arbitration
 - The decision to litigate