Summary
This 2-day intermediate-level course explores the transfer pricing developments around the world with a specific focus on the Asia-Pacific region. The course comprises recent international developments in transfer pricing, current transfer pricing issues, business restructuring, transfer pricing risk management as well as VAT and custom issues in transfer pricing. Participants will also have the opportunity to explore some of the practical issues around tax risk management and dispute avoidance in the context of the case study.

Overview and Learning Objectives
This is an interactive course with a limited number of participants. Prior to the course, participants will be given access to an online platform which provides them with additional pre-reading material and supplementary material (e.g. legal documentation, case law and related articles/literature). During the course, participants will be provided with a course binder containing documents relevant to the course.

Participants will receive a complimentary copy of the IBFD Tax Travel Companion on OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations.

Who should attend?
The course is suitable for transfer pricing advisers, lawyers, accountants, in-house transfer pricing managers, government officials and tax inspectors. The course will enable participants with a good understanding of the latest transfer pricing developments to gain an in-depth understanding of transfer pricing issues and learn how to manage them.

Course Level and Prerequisites
This is an intermediate-level course. Participants taking this course will be expected to have a good understanding of transfer pricing principles.
Day 1

08.30 - 09.00  Registration

09.00 - 09.20  Welcome and IBFD Overview

09.20 - 10.40  Recent International Developments in Transfer Pricing

- Increasing importance of transfer pricing
- Burden of compliance and its penalty
- Transfer Pricing Guidelines:
  - recent Developments in the OECD Transfer Pricing Guidelines
  - arm’s length principle and permanent establishments
  - UN Manual on Transfer Pricing for Developing Countries

10.40 - 11.00  Break

11.00 - 12.45  Current Transfer Pricing Issues

- Various issues in Asia-Pacific
  - marketing intangibles
  - manufacturing intangibles
  - location savings
- Comparative country approaches
  - India
  - China
  - Australia
  - Japan
  - United States
  - Case law
- Intercompany transaction and intangibles

12.45 - 14.00  Break – Lunch

14.00 - 15.20  Current Transfer Pricing Issues in Asia-Pacific (continued)

15.20 - 15.40  Break

15.40 - 17.00  Case Study
Day 2

09.00 - 11.00  Business Restructuring in Asia-Pacific

- Types of business restructuring in Asia Pacific
  - manufacturing activities: full-fledged manufacturers, contract manufacturer, toll manufacturer
  - distribution activities: full-fledged distributor, limited-risk distributor, commissionaires
- Various structures used in Asia-Pacific for business restructuring
- Arm’s length principle in business restructuring
- Tax issues of outsourcing in Asia-Pacific

11.00 - 11.20  Break

11.20 - 12.45  Transfer Pricing Risk Management in Asia-Pacific

- Transfer pricing risk management
  - Documentation requirements and penalties
  - Types of risk
  - Process to manage the risk and transfer pricing policy
- Dispute resolution under the OECD Model
  - Corresponding adjustments under article 9
  - Mutual agreement procedures
  - Arbitration
- Advance pricing arrangements (APAs)
  - benefits and disadvantage of APAs
  - eligibility and requirement for APAs
  - APAs and documentation procedures in different countries
  - methodologies used in APAs

12.45 - 14.00  Break – Lunch

14.00 - 15.20  Transfer Pricing: VAT and Customs Issues in Asia-Pacific

- Arm’s length value for VAT and customs
- Valuation in tax and customs
- Developments in various countries

15.20 - 15.40  Break

15.40 - 17.00  Case Study