SAT WIDENS NET WITH BULLETIN 6
– How China new TP platform impacts MNCs

Temperatures are rising in the world’s second largest economy. The trinity of Bulletins 6, 42 and 64 completes a New China TP Platform that widens the net and traps a quantum of companies. In this internationally-oriented seminar, our experts will highlight the most relevant and practical impacts of Bulletin 6. They will also share intelligence drawn from recent SAT meetings held in February that signal a new direction for 2017. In addition, they will discuss how US country by country reporting (CbCR) may bisect with these Chinese developments.

Among the high-pressure points are a set of initiatives that will redefine the calculus and elevate the TP audit risk.
Euromoney Guide to World’s Leading Transfer Pricing Advisers. He has led the China TP practice in one of the Big 4 accounting firms and also a Tier 1 law firm.

- **Profit Monitoring System:** SAT will use “Big Data”, desk-top analytics and review of the TP documentation to flag companies for TP risks.

- **The Cooperation Model:** SAT will stress cooperation over audits introducing new “Special Tax Adjustments Self-payment Form. Many more companies are going to be subjected to TP adjustments, but these adjustments are going to be “voluntary”.

- **China-Specific Innovations:** In Bulletin 6, SAT taking full artistic license to uncover the “value chain” used by multinationals has gone beyond BEPS to introduce China-unique concepts including DEMPEP, secret comparables, cash-box returns, overseas tested party, and the use of arithmetic mean.

Our experts will place these China developments in an international context to facilitate head office dialogue by sharing with the audience insights on provision of Fin 48 reserves and the exposure posed by US country by country reports (CbCR).

**Registration details 报名详情**

To register, please contact Lily Bao at qiaoyun.bao@dentons.cn or Lucinda Liu at di.liu@dentons.cn. Attendance is limited to two people per company and attendees will
如您有意向参与此次研讨会，请通过邮件的方式与 Lily Bao 或 Lucinda 联系（邮箱地址分别是 qiaoyun.bao@dentons.cn 或 di.liu@dentons.cn）。每个公司可派两名代表参与本次活动，报名成功后我们将向报名者发送确认邮件。谢谢！

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