



# MASTERCLASS 2016



29-30 SEPTEMBER 2016  
SINGAPORE

## Practical Transfer Pricing

### Calculation, Documentation & Implementation



Transfer pricing has always been a bit of a buzzword in the international tax arena. With changing regulations and increased scrutiny, companies must re-examine their transfer pricing methods and transactions, undertake proactive transfer pricing planning and diligently maintain contemporaneous transfer pricing documentation.

This 2-day **Practical Transfer Pricing Masterclass** will provide an in depth overview of transfer pricing, and give practical and personalized solutions to your business life cycle needs. Our expert facilitator will delve deep into computation of pricing for goods and service under various transfer pricing methods, and related aspects such as documentation and dispute avoidance.

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#### IN-DEPTH EXERCISES ON CALCULATIONS AND COMPUTATION OF ALTERNATIVE TRANSFER PRICING MODELS!

- Pros and cons of various transfer pricing methods and their application
- Key steps in transfer pricing implementation and monitoring
- Important elements of a realistic functional and risk analysis
- Transfer pricing risk sharing and risk shifting considerations
- Develop contemporaneous transfer pricing documentations
- Transfer pricing compliance obligations and typical non-compliance areas
- Defending techniques against complicated tax investigations
- The "Best" and "Worst" scenario analysis of intragroup transactions
- Benchmarking study of comparable companies and scenarios

#### WHO SHOULD ATTEND

Professionals involved in transfer pricing or cross-border taxation, from both private and public sectors, including:

- Chief Finance Officer
- Finance Managers, Directors and Controllers
- International and Cross-border Tax
- Accounting and Auditing
- Transfer Pricing
- Corporate Planning and Asset Management
- Tax Legal and Compliance

#### SPEAKERS



**CHERIE LEHMAN** is the Managing Director of Aspect Advisory, a global transfer pricing solutions provider focused on compliance issues. Cherie has over 15 years of transfer pricing experience in "Big 4" consulting firm environments, as well as leading the global transfer pricing teams of several multi-billion dollar multinationals. She has gained on-the-ground experience in the Asia region, Europe, the US and Australia, and therefore brings a unique, practical perspective to addressing transfer pricing matters. Cherie's transfer pricing career began with Arthur Andersen in Australia, and after attaining her Chartered Accountancy in 1996, she transferred to the firm's Dublin office, and later to the New York office. After several years with KPMG's transfer pricing team in New York, Cherie left consulting to lead transfer pricing from an in-house perspective. In 2010, after leading the transfer pricing teams of several large multinationals, Cherie founded Aspect Advisory.

Cherie Lehman is a Award-Winning Transfer Pricing Professional with experience working in Asia, Europe, United States and Australia:

- **Best Global Transfer Pricing Firm, 2016, Singapore – Acquisition International**
- **Transfer Pricing Advisory Firm of the Year, 2016, Switzerland – Corporate LiveWire**
- **Transfer Pricing Advisor of the Year 2014 – Finance Monthly Global Awards**
- **Leading Transfer Pricing Firm, TP Services, 2015 – TP Week**
- **Transfer Pricing Firm of the Year, Switzerland, 2015 – Corporate LiveWire**



**DONA MULLICK** is a Senior Associate with Aspect Advisory, a global transfer pricing solutions provider focused on compliance issues. She obtained an MBA (Finance) in addition to her Bachelor of Business Administration (Finance) and has over five years of practical transfer pricing consulting experience. Dona's transfer pricing professional career began

with Deloitte Touche Tohmatsu in 2010 in India, and after gathering experience in global transfer pricing, she moved to serve local Indian clients with KPMG in India. During the period of serving Indian clients, she worked on variety of compliance and defence assignments, such as documentation, accountant's report and, preparation of submissions for transfer pricing audit purposes. She joined Aspect Advisory in 2015 and has focused on global compliance services for multinationals throughout Asia, Europe and the North American regions.



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## TESTIMONIALS FROM PAST DELEGATES

*"It provides many practical experiences"*  
Ezra Holdings

*"Knowing the current market status is interesting and important – very good event"*  
Hyundai Heavy Industries

*"The scope covered was very comprehensive"*  
PetroChina

*"I learnt a lot and it was interactive with well-chosen simple exercises"*  
BNP Paribas

### DAY 1 - 29 SEPTEMBER 2016

#### Transfer Pricing Legislation and Guidelines

- The arm's length principles
- IRAS Transfer Pricing Guidelines
- BEPS action plan and OECD guidelines

#### Benchmarking - Comparability Analysis

- Benchmarking overview
- Safe havens and other materiality thresholds
- Internal vs external comparable data
- Comparability Factors
  - Functions
  - Assets
  - Risks
- Comparability adjustments

#### Selections of Transfer Pricing methods – How and why

- Regulations and practice
- Traditional transaction method
  - Comparable Uncontrolled Price Method
  - Cost Plus Method
  - Resale Price Method
- Transactional Profit Methods
  - Transactional Net Margin Method
  - Transactional Profit Split Method
- Other methods

**EXERCISE:** Strength and weaknesses analysis

**EXERCISE:** Scenario analysis

**EXERCISE:** Computation of Arm's Length Price under each method above

#### Step-by-Step Transfer Pricing Documentation

- Key components of transfer pricing documentation
  - Masterfile and Local Country file
  - Industry, company and functional analysis
  - Operational and Legal structure
  - Selection of method and implementation
  - Other important information to be included
- Transfer pricing documentation template
- Effective drafting of the company overview and industry analysis
- Conducting functional analysis interviews on roles performed by every entity involved in a related party transaction
- Preparing functional analysis write-ups for assets and risks borne by each entity involved in a related party transaction
- Current and future transfer pricing documentation content recommended by the OECD
- Requirement set by Inland Revenue Authority of Singapore
- Updates on Singapore's recent commitment to implement measures against BEPS and what this means for other countries?

**EXERCISE:** How it looks like – Sample of "Perfect" Transfer Pricing Documentation

### DAY 2 - 30 SEPTEMBER 2016

#### Country-by-Country Reporting

- When is it relevant?
- What is required?
- How to analyse the results and manage risks

#### Transfer Pricing Implementation – Operational Transfer Pricing

- Implementation of a transfer pricing policy
- Monitoring of transfer pricing practices
- Adjustments

#### Transfer Pricing Risk management

- Transfer pricing risk management strategy
- Preparation for transfer pricing audit

**EXERCISE:** Transfer Pricing Risk Map

#### Transfer Pricing and Business Restructurings

- Current attention
- Main tax issues that arise when business restructure

**EXERCISE:** Restructuring of a Manufacturing Operation

#### Transfer Pricing Controversy and Dispute Resolution

- Tax dispute avoidance techniques
- Tax audit management practices
- Tax dispute resolution alternatives

To book, please visit [www.regonline.com/transferpricing2016](http://www.regonline.com/transferpricing2016)

**EARLY BIRD RATE:** SGD1,299 (ends on 26 August 2016)

**STANDARD RATE:** SGD1,499

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For more information about this event or to register your pass, please contact **Suzana Ahmad** at (65) 6870 3411 or [suzana.ahmad@thomsonreuters.com](mailto:suzana.ahmad@thomsonreuters.com)