



The Finer Points of Transfer Pricing Essentials

- Know the intricacies and interplay of Functional Analysis, TP Methods, TP Benchmarking

Back By Popular Demand!

YES! Register me NOW!

Transfer Pricing documentation is now mandatory. Increased scrutiny by tax authorities. Ever-changing TP rules. **NOW** is the time to go back to the all-essentials of TP in this revised and updated series many have raved about!



The Finesse of Functional Analysis

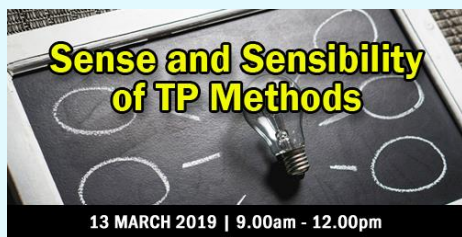
Date: 11 February 2019, Monday
Time: 2.30 – 5.30pm
Venue: To Be Advised
Closing Date: 7 February 2019

Successfully Completed

“Practical tips shared are relevant”

“Better appreciation of TP”

- Be aware of the characteristics of prepared functional analysis and its role in minimising Transfer Pricing (TP) risks
- Know the systematic process to adopt in getting functional analysis right
- Understand the different approaches in developing various functional analysis through case studies
- Walk away with key tips to minimise common mistakes and best practices to armour yourself against any challenges



Sense and Sensibility of TP Methods

Date: 13 March 2019, Wednesday
Time: 9.00am – 12.00pm
Venue: To Be Advised
Closing Date: 6 March 2019, Wednesday

“(The session provided) a good overview and understanding of the principles of different TP Methods.”

- Gain an overview of the various TP methods and the key considerations when applying them
- Learn how to determine and apply the most appropriate method rule
- Understand the application of TP methods for services, distribution and intercompany loans through various case studies
- Be aware of the misconceptions and errors and learn of the dos and don'ts



Breakthrough with TP Benchmarking

Date: 5 April 2019, Friday
Time: 9.00am – 12.00pm
Venue: To Be Advised
Closing Date: 29 March 2019, Friday

“This course has more in-depth learning of TP as compared to others I had attended before.”

“Enlightening and useful”

- Understand the rationale and principle of benchmarking studies
- Know how to perform a benchmarking analysis – illustrated with a case study using database
- Be aware of the do's and don'ts for benchmarking analysis
- Walk away with key tips to minimise risks

Seminar Fee (per session)

\$ 94 – SIATP/ ISCA Member
\$118 – Association Member/
Transfer Pricing Solutions' Client
\$168 – Non-Member

Sign up for more sessions and enjoy bundle rates!

Enjoy **\$28 off** if you register for two sessions.

The Finesse of Functional Analysis

- Be equipped with the finer points of functional analysis in transfer pricing

The principle of substance over form is king in the current tax landscape

Allocation of profits and risks based on contracts alone is not enough. Global profits are increasingly taxed based on where value is created. A good evidential value is created lies in a well prepared functional analysis.

Successfully Completed

Register for this session for a deeper understanding of the finer points of functional analysis. Learn about the important elements and understand the practical issues through various case study exercises. Get a good grasp of potential TP risk areas and key tips to minimise these. Walk away from the session being better equipped in managing tax queries.

Sense and Sensibility of TP Methods

- Comprehend the various transfer pricing methods and their applications

An area that taxpayers and authorities may disagree upon is the application of the five TP methods recognised by the Organisation for Economic Co-operation and Development (OECD). This often escalates into disputes, in which companies have to demonstrate why and how the specific method was adopted.

Come gain practical insights of the common TP methods through various case studies. Learn the techniques in ascertaining the appropriate method and pick up key tips to select and apply the TP method that best suits the type of related party transaction. Be ready to stand up to any scrutiny on your TP method!

Breakthrough with TP Benchmarking

- Be familiarised on this more complex area of TP and other requirements

Transfer Pricing (TP) – once an area that didn't get much attention – is now a hot topic that is discussed both by tax professionals and business leaders, not to mention, the tax authorities too.

Come learn about the intricacies on a more complex area of TP – benchmarking – and get it right, right from the start. Understand what is involved in the preparation and see how principles are applied. Know the right questions to ask non-tax colleagues to ensure your analysis is done right. Learn about essential tips and possible blind spots many may miss in their analysis.

Using a case study approach, this session will illustrate the use of databases and provides you with a step up in your knowledge in this crucial aspect of TP.

About the Facilitator



Ms Adriana Calderon
Director
Transfer Pricing Solutions Asia
*Asia Best Newcomer Firm of the Year 2017**

Adriana Calderon has extensive international experience with Big Four and mid-tier firms advising multinational companies in the areas of corporate and international taxation across South America, the US, Australia and the Asia Pacific Region. In Asia Pacific, Adriana has specialised in the area of TP, building on her Latin American experience as a lawyer in commercial and tax legislation.

As a TP practitioner, Adriana has advised companies in the Asia Pacific Region across various industries and in a wide range of projects associated with planning, compliance and dispute resolutions with tax authorities. She has also participated in specialised projects involving pricing of financial transactions, business restructures and negotiation of APAs. Most recently, she has participated in TP planning projects to implement BEPS's Action Plan and country-by-country reporting.

Adriana also enjoys teaching and has been involved in various TP seminars and workshops. Besides being a TP trainer at the Institute of Singapore Chartered Accountants, Adriana has also facilitated in training sessions for CFOs, tax teams of large companies and consultancies, and tax executives at the Australian Taxation Office.

*Asia Tax Awards 2017 by International Tax Review