

Transfer Pricing: The next step into complexity

Elevating your transfer pricing approach to take on complexity head-on and mastering the next wave of challenges

The Regent Hotel, Singapore

15th & 16th November 2007

"We are all inventors, each sailing out on a voyage of discovery, guided each by a private chart, of which there is no duplicate. The world is all gates, all opportunities."

Ralph Waldo Emerson

Do not begin by saying that you have your bases covered. Start by asking how Transfer Pricing can elevate your organisation's profit to the next level!



Facilitated by international expert:

Robert Feinschreiber International Tax Practitioner and Advisor, CEO

TransferPricingConsortium

Author of Transfer Pricing Handbook, Transfer Pricing Methods: An Applications Guide and Transfer Pricing International: A Country-by-Country Guide

Jesper Solgaard Head of International Tax Services, Transfer Pricing and Tax Effective Supply Chain Management

Ernst & Young Singapore International Tax Services

Testimonials

"It is refreshing to find a treatise on transfer pricing that combines practical business considerations, economic theory and a discussion of technical tax rules in a way that is meaningful not only for large corporate enterprises, but also small and medium sized businesses."

Vikram A. Gosain, JD, CPA Director of Transfer Pricing
General Electric Capital Corporation

"Bob's vast experience in transfer pricing matters has again been captured between the covers of a book. Thank you, Bob, and your contributing colleagues, for producing another valuable helpmate."

Alan Getz Vice President & General Manager - Tax
Mitsui & Co. (U.S.A.) Inc.

"Transfer Pricing Methods is the latest episode in Robert Feinschreiber's no-nonsense approach to transfer pricing. It should become a standard tool for every owner-managed and midcap multinational."

Enrique MacGregor Principal-in-Charge of Transfer Pricing Services
Grant Thornton LLP

Learning objectives

Gain value from this unequalled interactive event by acquiring expert advice on:

- **Creating** opportunities for better tax planning that fully utilises transfer pricing methodologies and create savings
- **Understanding** the implications of a transfer pricing methodology and creating a picture fit for your organisation
- **Developing** transfer pricing strategies that take advantage of weaker governed tax regimes and capitalise on governmental incentives for transfer pricing
- **Gaining** insights into opportunities and pitfalls when structuring intra-firm agreements
- **Addressing** business and industry changes that impact transaction pricing
- **Equipping** yourself with sufficient measures to handle dispute resolutions in transfer pricing practices
- **Crafting** tax effective supply chains to maximise tax benefits
- **Determining** the appropriate rate for arms length principle
- **Pricing** trends and adjusting your pricing to reflect market value in different markets
- **Minimising** your exposure to scrutiny by getting the latest updates in documentation requirements

marcus evans training courses are thoroughly researched and structured to provide intense practical training applicable to your organisation.

Benefits include:

- Combinations of educational presentations, productive in-session assignments and participant collaboration to provide actionable learning
- Strictly limited seats to allow for greater one-on-one interaction with the trainer
- Detailed pre-course questionnaires to allow us to tailor the program to address your individual concerns
- Comprehensive course materials, action plans and checklists
- Utilisation of the skills, learning, experiences and knowledge of the participants and workshop leader through interactive plenary and small group discussions

Pre-course questionnaire

To ensure that you gain maximum benefit from this event, a detailed questionnaire will be sent to you to establish exactly what your training needs are. The completed forms will be analysed by the course trainer. As a result, we ensure the course is delivered at an appropriate level and that relevant issues will be addressed. The comprehensive course material will enable you to digest the subject matter in your own time.

***Early Bird & Group Discounts**
Ask about our savings

Endorser



Supporting Publication



Thursday 15th November 2007

The program is designed specifically for participants to work through a dedicated Transfer Pricing process focusing on Singapore's IRAS Circular Transfer Pricing Guidelines and on related party transfer pricing policies elsewhere in Asia. If you (or one of your colleagues) have been to a previous program, you will appreciate the greater depth of this program, and will have an opportunity to address issues that are now relevant to your progress in an in-depth manner. The training is a high-level, intensive and vigorous program that will move rapidly.

The sessions will be introduced by the presenter/facilitator and then participants will have the opportunity to develop their own plan. It is an extremely practical program where participants will spend considerable time working on their own ideas that will enable them to achieve superior performance within their personal work domains. The program will contain case studies and learning principles from various organisations, which will enable participants a frame of reference from which they can then launch into their own activity.

Session One

Exploring current transfer pricing trends and issues

- Delineating between "controlled entities" and "uncontrolled entities" as the transfer pricing threshold. What does IRAS Circular Transfer Pricing Guidelines 2.2 really mean?
- Customs valuation and transfer pricing alternatives
- Analysing country-by-country GNP characteristics in the development of transfer pricing
- Picking up techniques for avoiding double taxation
- Developing alternative bases of control for determining an affiliated business relationship
- Affiliated party relationships – the OECD attempts to catch up to developments in Asia
- How intangible property impacts transfer pricing – technology intangibles and market intangibles
- How services costs impact the transfer pricing structure
- Cost contribution, cost sharing, and buy-in payments in research and development context and other situations
- Avoiding and resolving transfer pricing disputes – advance pricing agreement programs

Session Two

Bolts and nuts of transfer pricing -The Organisation for Economic Co-operation and Development's perspective

- Why Singapore uses OECD rules
- The evolution of documentation as the OECD attempts to catch up with United States rules
- Functional analysis – why the activities that business performs impact transfer pricing
- Arm's length price range – the role of the interquartile distribution
- Analysing entries into new markets touching on situations in which a marginal costing transfer pricing approach is viable
- Exploring transactional net margin method and comparable profits methods
- Crafting insight into specific tax treaty provisions: How do they impact transfer pricing
- Treading murky waters: Deciding when to use – or avoid blacklisted countries

Pricing Strategy: Applying pricing methodologies

Session Three

Determining the most accurate measure of Arm's Length Price

- Applying IRAS Circular Transfer Pricing Guidelines Section 3
- Asking the important questions: What are the parameters that fit each alternative?
- Recognising other transfer pricing alternatives
- Realising the importance of in-house comparables
- Asset based methods and rate of return
- Transactional profit methods – determining amounts at cost or at current value
- Circularity – preparing simultaneous ratio analysis for sales and expenses
- Inflation issues in applying return-on-asset computations
- Contract manufacturers and the return-on-assets computation
- Economics of inventory purchases

Why you cannot miss this event

As multi nationals compete to increase worldwide profitability and shareholder returns, business restructuring has become a common theme resulting in outsourcing and transferring of activities (functions/assets/risks) from "high cost" countries to "low cost" countries. This is commonly described as "supply chain management". While this is all understandable from a commercial viewpoint, the question the taxman has is, "does typical supply chain management create any tax liabilities?" The answer is not that simple as once again the advisers say "it depends".

The phase of technical know-how has long left the buzz in Singapore but what happens when complexity creeps up? As legislation remains vague and incentives roll across the board, is turning back to your consultant the only notion and strategic move you have left in your repertoire to master transfer pricing? Let us examine and begin to question ourselves, do we want to overburden our practices based solely on the expertise of consultants when a complex problem presents itself?

Begin by picking key pointers on improving and strengthening your tax effective supply chains and further create awareness on the different components that threatens to murky the waters. Many multinationals rely on directives from headquarters to proceed with transfer pricing activities. The ensuing question that arises would be how secure is this methodology or the flexibility beyond the red tape to respond to changes in the tax market that could spell unprecedented rewards or oblivion of transfer pricing activities in that territory itself.

As the world emerges and Asian countries begin to be aware of changes and advantages in transfer pricing activities, the road forward has been forged. What remains is the question of whether will you be willing to rest on your laurels and allow further opportunities to confound you. Will you dare to take the next step forward and embrace the complexity? Step on board this marcus evans invitation and go beyond the basic know-how and establish a firm platform in transfer pricing heading into an era of volatility and complexity.

Who should attend

Primary Market

Directors, managers, heads of:

- Transfer Pricing
- Finance
- Taxation or Tax management
- Finance and taxation
- Financial Planner
- Costing and Budget
- Accountants
- Auditors
- Corporate Controllers
- Financial Controllers / Managers
- Economists
- Business Owners
- Chief Financial Officers
- Company/chartered secretaries

From all industries

Secondary Market

- Accountants
- Tax consultants and auditors
- Solicitors and lawyers
- Software vendors

About the Endorser

Paying taxes in just jurisdiction is enough. **TransferPricingConsortium.com** can help you avoid the pitfalls of double taxation. We offer tactics to defend your transfer pricing. Keep your profits. It's your money.

Pricing Strategy: Application of pricing methodologies that spell rewards**Session One****Optimising the transfer pricing methodology concerning goods, services and financial transactions**

- Inter-quartile range
- Risk analysis
- Contract terms
- Geographic issues, including freight and insurance
- Intangibles
- Management service fees and royalties
- Company loans - determining interest rate comparables

Documentation**Session Two****Clarification on the documentation rules**

- Understanding the contemporaneous documentation standard
- Preserving the necessary documentation
- Examining crime and penalty issues for document destruction
- Creating and following internal corporate manuals to substantiate compliance with the contemporaneous documentation requirement
- Applying IRAS Circular Transfer Pricing Guidelines Section 4

Session Three**Examining Specific Transfer Pricing implications**

- Examining the genesis of specific transfer pricing documentation rules
- Understanding the importance of the Toyota litigation
- Meeting the IRAS circular Annex G Requirements
- Examining the role of the Pacific Association of Tax Administrators
- Highlighting the responsibilities placed on foreign owners

Exploring transfer pricing in Asia: Country-by-country transfer pricing issues. The following issues will be covered by the subsequent sessions on a country by country-by-country basis

- Current transfer pricing issues
- Transfer pricing methods used in each country
- Issues in advance transfer pricing agreements
- Transfer pricing audits and penalties
- Documentation requirements

Session Four**The window into the East**

China and Korea

Session Five**The superlative forces**

Vietnam, India and Japan

Session Six**Fencing the frontyard and the upcoming wave**

South East Asian countries (Indonesia, Malaysia, Singapore, Taiwan, Thailand) and Asian Transfer Pricing issues in Latin America

Programme Schedule

0830	Registration and Coffee
0900	Session Starts
1030	Refreshments & Networking Break
1050	Session Resumes
1245	Luncheon
1345	Session Starts
1500	Refreshments & Networking Break
1520	Session Resumes
1730	End of Training

About your course trainer:**Robert Feinschreiber** International Tax Practitioner and Advisor, CEO
TransferPricingConsortium

Robert Feinschreiber is an international tax practitioner, an attorney and counselor in Miami. His firm concentrates on international transfer pricing and DISC. Clients include foreign-owned U.S. businesses, U.S. exporters, and U.S. companies facing transfer pricing issues. He has been primarily involved in tax areas include:

- Advocating the adoption of an American production incentive program for more than 30 years. He is now helping U.S. taxpayers claim section 199 domestic production deduction benefits
- Helping U.S. exporters maximise DISC and other tax incentives for 35 years, including planning and audit defense
- Engaged in transfer pricing including planning, audit defense, APAs, and penalty elimination for more than 20 years
- Engaged in Asian transfer pricing projects for 25 years focusing on documentation and the responsibility of each part to keep transfer pricing records

Robert has written more than 100 current articles as well as many books on taxation, including Foreign Sales Corporations, Fundamentals of International Taxation, Domestic International Sales Corporations, Tax Incentives for U.S. Exports, International Tax Planning Today and Tax Reporting for Foreign-Owned U.S. Corporations. With the expertise, he has been quoted as an authority by Tax Court, Business Week, and Forbes and has been a consultant to several foreign governments and was a CPA in Florida.

Robert is the editor of CCH's Corporate Business Taxation Monthly. He was the founding editor of the International Tax Journal, and has been the editor of Export Tax Report and the United States editor of Tax Haven and Shelter Report. He was formerly the U.S. correspondent for Tax News Service, published by the International Bureau of Fiscal Documentation. Apart from the above duties, Robert has wide experience in lecturing. He has taught accounting at Yale and law at Wayne State University Law School and was the director of the International Tax Institute. Mr. Feinschreiber has lectured at various tax conferences on such topics as foreign sales corporations, DISC, intercompany pricing, Subpart F, foreign tax credit, the research credit, and depreciation. He also has lectured for the American Management Association, International Business Seminars, the International Tax Institute, the World Trade Institute, where he was the Senior International Tax Advisor, CITE, and other organisations.

About your course trainer:**Jesper Solgaard** Head of International Tax Services, Transfer Pricing and Tax Effective Supply Chain Management
Ernst & Young Singapore International Tax Services

A transfer pricing specialist, Jesper is Danish and has since January 2006 relocated to Singapore to head Ernst & Young Singapore's International Tax Services, Transfer Pricing and Tax Effective Supply Chain Management (TESCM) desk.

He is responsible for Ernst & Young's TESCM activities in the Asia Pacific and is the go-to-market leader for transfer pricing in the Far East area. In addition, he is part of Ernst & Young's Far East Steering Committee for International Tax.

He joined Ernst & Young in 1992, initially as an auditor for Danish public multinationals. From 1998 to 2006, he served as the leader for Transfer Pricing and TESCM in the Nordic region. He was a member of Ernst & Young's European Transfer Pricing Executive Committee from 2002 to 2006.

Jesper has experience in coordinating regional and global tax services for multinational clients. His expertise spans multiple industries and he serves as the Strategic Transfer Pricing Advisor to several multinationals and has extensive experience in Transfer Pricing conversion and restructuring issues (e.g. commissionaires, limited risk distributors, global purchasing/sourcing structures).

marcus evans would like to thank everyone who has helped with the research and organisation of this event, particularly the trainer, who has kindly committed and supported the event.

Transfer Pricing: The next step into complexity

SG-FNT616 Please write in BLOCK LETTERS

Sales Contract

Please complete this form immediately and fax back to

TAN PENG PHENG

Fax: +603 2723 6699

Name: _____

Position: _____

Email: _____

Name: _____

Position: _____

Email: _____

Name: _____

Position: _____

Email: _____

Organisation: _____

Address: _____

Town: _____ State _____ Postcode _____

Tel: () _____ Fax: () _____

Nature of Business: _____

Company Size: 1-9 10-24 25-49 50-99
 100-249 250-499 500-999 1000+

Authorisation

Signatory must be authorised to sign on behalf of contracting organisation.

Name: _____

Position: _____

Signature: _____ Date: / /

This booking is invalid without a signature.

Fees

- Professional Training fee** @ USD2,195 + GST / VAT (if applicable) per delegate
- Premier Plus** - Bring 3 or more delegates to this event and benefit from a 10% SAVINGS off the regular price

All options inclusive of course papers, luncheon, refreshments & service charge.

Indemnity: Should for any reason outside the control of **marcus evans** training, the venue or speakers change, or the event be cancelled due to an act of terrorism, extreme weather conditions or industrial action, **marcus evans** training shall endeavour to reschedule but the client hereby indemnifies and holds **marcus evans** training harmless from and against any and all costs, damages and expenses, including attorneys fees, which are incurred by the client. The construction, validity and performance of this Agreement shall be governed in all respects by the laws of Singapore to the exclusive jurisdiction of whose Courts the Parties hereby agree to submit.

Business Opportunities

A limited amount of exhibition space is available at the conference. Sponsorship opportunities covering the lunch and documentation also exist. For further details contact **Raj Anand** on (65) 6720 0620 or e-mail raja@marcusevanssg.com.



Register Now

Code:E

Contact Marketing at **marcus evans**

Tel: +603 2723 6614

Fax: +603 2723 6699

Email: tanp@marcusevanskl.com

Date: 15th & 16th November 2007

Venue: The Regent Hotel, Singapore

Hotel Accommodation

Accommodation is not included in the training fee. To reserve accommodation at the training venue, please contact the hotel at (65) - 6733 8888 and make it clear that you are attending **marcus evans** training event quoting SG-FNT616 as a reference.

marcus evans

CP 21 Suite 2101, Level 21 Central Plaza
34 Jalan Sultan Ismail, 50250 Kuala Lumpur
Malaysia
www.marcusevans.com

Payment Method

Payment is required within 5 working days on receipt of invoice

Credit Card:

Please debit my Visa Mastercard Amex Diners

Card Holder's Name: _____

Card Number:

□□□□ □□□□ □□□□ □□□□

Security Code:

□□□□

Signature: _____ Expiry Date: _____ / _____ / _____

Confirmation Details: After receiving payment a receipt will be issued. If you do not receive a letter outlining joining details two weeks prior to the event, please contact the training coordinator at **marcus evans** training.

Terms & Conditions

- Fees are inclusive of programme materials and refreshments.
- Payment Terms: Following completion and return of the registration form, full payment is required within 5 days from receipt of invoice. PLEASE NOTE: payment must be received prior to the conference date. A receipt will be issued on payment. Due to limited conference space, we advise early registration to avoid disappointment. A 50% cancellation fee will be charged under the terms outlined below. We reserve the right to refuse admission if payment is not received on time. Unless otherwise stated on the booking form, payment must be made in pounds sterling.
- Cancellation/Substitution: Provided the total fee has been paid, substitutions at no extra charge up to 14 days before the event are allowed. Substitutions between 14 days and the date of the event will be allowed subject to an administration fee of equal to 10% of the total fee that is to be transferred. Otherwise all bookings carry a 50% cancellation liability immediately after a signed sales contract has been received by **marcus evans** (as defined above). Cancellations must be received in writing by mail or fax six (6) weeks before the conference is to be held in order to obtain a full credit for any future **marcus evans** conference. Thereafter, the full conference fee is payable and is non-refundable. The service charge is completely non-refundable and non-creditable. Payment terms are five days and payment must be made prior to the start of the conference. Non-payment or non-attendance does not constitute cancellation. By signing this contract, the client agrees that in case of dispute or cancellation of this contract that **marcus evans** will not be able to mitigate its losses for any less than 50% of the total contract value. If, for any reason, **marcus evans** decides to cancel or postpone this conference, **marcus evans** is not responsible for covering airfare, hotel, or other travel costs incurred by clients. The conference fee will not be refunded, but can be credited to a future conference. Event programme content is subject to change without notice.
- Copyright etc: All intellectual property rights in all materials produced or distributed by **marcus evans** in connection with this event is expressly reserved and any unauthorized duplication, publication or distribution is prohibited.
- Client information is kept on **marcus evans** group companies database and used by **marcus evans** group companies to assist in providing selected products and services which maybe of interest to the Client and which will be communicated by letter, phone, fax, (inc. automatic dialling) email or other electronic means. If you do not want **marcus evans** to do this please tick this box []. For training and security purposes telephone calls maybe recorded.
- Important note: While every reasonable effort will be made to adhere to the advertised package, **marcus evans** reserves the right to change event dates, sites or location or omit event features, or merge the event with another event, as it deems necessary without penalty and in such situations no refunds, part refunds or alternative offers shall be made. In the event that **marcus evans** permanently cancels the event for any reason whatsoever, (including, but not limited to any force majeure occurrence) and provided that the event is not postponed to a later date nor is merged with another event, the Client shall receive a credit note for the amount that the Client has paid to such permanently cancelled event, valid for up to one year to be used at another **marcus evans** event. No refunds, part refunds or alternative offers shall be made.
- Governing law: This Agreement shall be governed and construed in accordance with the law of Singapore and the parties submit to the exclusive jurisdiction of the Singaporean Courts in Singapore. However **marcus evans** only is entitled to waive this right and submit to the jurisdiction of the courts in which the Client's office is located.