

# Transfer Pricing Masterclass 2009

SAVE S\$500

EARLY BIRD SPECIAL

ONLY  
S\$999\*

(+GST)

\* ENDS 30 OCT 2009

S\$1499+GST  
THEREAFTER

▶ 24 November 2009 ▶ 9:00 am-5:00 pm ▶ The Ritz-Carlton, Millenia Singapore



The **3rd annual Transfer Pricing Masterclass 2009** brings together leading tax directors, officials and advisers to discuss the latest issues affecting Singapore and the region. Experts will provide you with the best advice for adopting prudent tax and accounting measures in order to maximise and protect your company's revenue at a time of increased scrutiny of transfer pricing arrangements.

- ▶ **Acquire** in-depth knowledge on recent transfer pricing trends developments and legislations within the region
- ▶ **Mitigate** transfer pricing risks, through application of appropriate transfer pricing methods
- ▶ **Hear** about the latest transfer pricing updates in Singapore and across the region
- ▶ **Avoid** transfer pricing penalties locally and abroad
- ▶ **Re-examine** documentation requirements, exchange of information and burden of proof issues
- ▶ **Gain** insights into case law developments in India in transfer pricing
- ▶ **Examine** advance pricing developments in Japan
- ▶ **Clarify** increased security requirements for transfer pricing arrangements
- ▶ **Overcome** obstacles with respect to documentation requirements and burden of proof

## Who should attend:

Managers, Heads and Consultants of:

- ▶ Transfer Pricing
- ▶ Finance
- ▶ Taxation or Tax Management
- ▶ Accounting
- ▶ Auditing
- ▶ Legal

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## topics include

### **Transfer Pricing in a Changing Economic Environment**

- Increased scrutiny of transfer pricing arrangements
- Paying your fair share of taxes
- Different statistical methods to reflect your business cycle

### **Transfer Pricing in Singapore**

- Supplementary administrative guidelines
- Related party loans & services
- Cost pooling arrangements

### **International Transfer Pricing in Asia Pacific**

- Overview of transfer pricing in SEA, India, China, Japan and South Korea
- Common risks and issues in the region
- Managing transfer pricing risk in Singapore and impacts overseas
- Master file approach and best practices

### **Updates of Transfer Pricing in Key Jurisdictions in Asia Pacific**

- Services and loan provisions in Singapore
- Advance rulings in Malaysia
- Documentation requirements in China
- Case law developments in India
- Advance pricing developments in Japan

### **Documentation Requirements & Exchange of Information in APAC**

- Implementation of transfer pricing documentation requirements
- Use of exchange of information clauses in transfer pricing audits
- Emerging issues
- The interaction between transfer pricing & customs
- Balancing transfer pricing legislation and compliance burden



## the speakers

### **Ernst & Young Jesper Solgaard**

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

Jesper has since 2006 been head of International Tax Services, Transfer Pricing and Tax Effective Supply Chain Management at Ernst & Young Singapore. He has been with Ernst & Young since 1992, initially as auditor for Danish public Multinationals, and from 1998 to 2006 as responsible for Transfer Pricing and Tax Effective Supply Chain Management in the Nordic Region as Partner in Denmark and from 2002 to 2006 as Partner in Sweden. Jesper also serves as 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).

### **Transfer Pricing Consortium, United States of America Robert Feinschreiber**

*International Tax Practitioner & Advisor*

Robert is an experienced tax practitioner, an attorney and counselor in United States. He has written more than 100 current articles on taxation and has been quoted as an authority by Tax Court, Business Week, and Forbes. Robert has been a consultant to several foreign governments and was a CPA in Florida. He was the founding editor of 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 U.S. correspondent for Tax News Service, published by the International Bureau of Fiscal Documentation. He has taught accounting at Yale and law at Wayne State University Law School and was director of the International Tax Institute

### **Transfer Pricing Consortium, United States of America Margaret Kent**

*Attorney*

Margaret has been an attorney for 20 years, focusing on law and international taxation. She has structured major transfer pricing cases in Latin American countries. Margaret has defended clients in response to IRS information documentation requests and prepared protests for clients on transfer pricing litigation issues. She is the co-editor of International Mergers and Acquisitions and Corporate Business Taxation Monthly, CCH.

### **Crowe Horwath, Singapore Sivakumar Saravan**

*Tax Partner*

Siva sits as Chairman of Crowe Horwath International's Asia Pacific Tax Committee and member of Crowe Horwath International Tax Committee. He has been involved in various cross border tax assignments which includes planning optimal cross-border tax structures, advising Singapore based multinationals on transfer pricing and advising on tax implications of cross-border management fee charges in countries such as China, India, Indonesia, Malaysia and Thailand. He is the consultant editor of CCH's Singapore Master Tax Guide manual and co-authors the CCH Worldwide Business Tax Guide. He is a member of Institute of Certified Public Accountants of Singapore and Singapore Institute of Arbitrators.

### **PwC Singapore, Board of Advisors, Singapore Tax Academy Paula Eastwood**

*Head of Corporate Tax*

# Order Form

Registration includes presentations, lunch, networking sessions, refreshments and delegate pack.

# REGISTER NOW SAVE S\$500

LIMITED SEATS AVAILABLE

Please reserve \_\_\_\_\_ seat(s) at "Transfer Pricing Masterclass 2009" on Tuesday, 24 November 2009.

- Early Bird Special: S\$999 + GST (For registration and payment received by 30 October 2009)
- Regular Conference Fee: S\$1499 + GST (For registration and payment received from 31 October 2009)
- 10% off for group booking of 3 or more

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## Four easy ways to register

### Contact Pani

 Tel: (65) 6423 4631 Ext 211  
 Fax: (65) 6423 4632

 Email: [pani@keymedia.com.sg](mailto:pani@keymedia.com.sg)  
 Website: [www.keymedia.com.sg](http://www.keymedia.com.sg)

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