

Transfer Pricing Developments

Come listen to international authors and get an overview of the latest developments in Transfer Pricing. In this rare opportunity, come and have a better understanding of the myriad of changes happening globally. Get clear helicopter insights to the dizzy changes in OECD guidelines, documentation requirements, country specific provisions and much more.

OBJECTIVES

What you will gain from this talk:

- **Knowing what can expect this year – and in the immediately following years**
- **Understanding the accountants' current role in transfer pricing**

OUTLINE

- **The Starting Point - Basic OECD Documents**
 - a. Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations (2010)
 - b. Model Income Tax Convention
 - c. Intangible Provisions Conference (OECD Meeting, Paris, November, 2012)
- **Breathtaking OECD developments – Rapid Changes Between May and July**
 - a. Intangible Provisions 30 July 2013
 - b. Transfer Pricing Safe Harbours 16 May 2013
 - c. BEPS Action Plan 13 July 2013
 - d. Tax Information Exchange – Global Forum
 - e. Documentation Provisions 30 July 2013
- **Overall Transfer Pricing Consequences – Who are “players” in the Transfer Pricing Table?**
 - a. Non-OECD members – Is the OECD Broadening its Scope
 - b. United Nations – Is the UN OECD's Competition?
 - c. Impact of the World Customs Organization
 - d. International Monetary Fund
 - e. The World Bank
 - f. ASEAN Pact, ASEAN Plus 3
- **Other Transfer Pricing Related Provisions**
 - a. UK – Inland Revenue provisions
 - b. US – FATCA Provisions
- **Status of Country-Specific Transfer Pricing Provisions**
 - a. Singapore's Provisions for Related-Party Loans and Services
 - b. Radha Rani's Control and Management – Singapore versus India

ABOUT THE SPEAKERS

Mr Robert Feinschreiber
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Robert is a Senior Partner at Quanterra Global, the premier transfer pricing firm and an attorney. He focuses on resolving transfer pricing disputes and on developing comprehensive worldwide transfer pricing strategies for large and mid-sized businesses.

Robert has been a consultant to several foreign governments in transfer pricing issues, but his primary activity is to defend international businesses. He focuses on OECD transfer pricing, transfer pricing in the United States and in Asia.

An author of more than 100 current articles on taxation, Robert has been quoted as an authority by the U.S. Tax Court, Businessweek, Forbes and Wall Street Journal.

Ms Margaret Kent
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Margaret is a Senior Partner at Quanterra Global, the premier transfer pricing firm and an attorney for 20 years. Together with Robert, she focuses on resolving transfer pricing disputes and on developing comprehensive worldwide transfer pricing strategies for large and mid-sized businesses.

Margaret has been a consultant to several foreign governments in transfer pricing issues but her primary activity is to defend international businesses. She focuses on OECD transfer pricing, transfer pricing in the United States, Asia and South America.

Margaret is also the co-editor of both Corporate Business Taxation Monthly and International Mergers and Acquisitions.