



## **4 DAYS COURSE ON FUNDAMENTALS OF TRANSFER PRICING**

<b>Venue:</b>	<b>IFA International Fiscal Academy, C-56/9A, Sector -62, NOIDA</b>
<b>Dates:</b>	<b>5<sup>th</sup>, 12<sup>th</sup>, 13<sup>th</sup>, 19<sup>th</sup> December 2015</b>
<b>Timing:</b>	<b>10:00 AM – 5:00 PM</b>
<b>Investment:</b>	<b>Rs.5,000 <u>plus 14.5% Service Tax</u> (Incl. of Lunch, Refreshments &amp; Course Materials) <i>(See registration form on last page)</i></b>
<b>Speakers:</b>	<b>Eminent speakers from the profession and industry</b>

### **Learning Objectives:**

- Understand the concept of arm's length and the various transfer pricing methods permitted by the law.
- To experience and learn, with the help of illustrations and case studies, the process of compilation of transfer pricing documentation.
- To gain appreciation of the prevailing positions of the tax authorities and judiciary on various transfer pricing issues.
- Get updated on recent developments like BEPS; use of range and multiple year data.

### **Best suited for:**

- Professionals in practice who want to enter or having already entered want to excel in the law and practice of transfer pricing.
- Professionals in industry who want to understand the subject of transfer pricing and help the corporate employers in development and effective management of transfer pricing policy and risk.
- Tax officers who want to understand more on the subject of transfer pricing to help perform their assessment functions more effectively.

*For any queries or clarifications, please contact us at +91-9868-35-8787 or email to [taxcourses@ifa-indiaacademy.in](mailto:taxcourses@ifa-indiaacademy.in)*



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**PROGRAM SCHEDULE**

**Day 1 (5<sup>th</sup> December, 2015)**

<b>Timing</b>	<b>Topics</b>
10:00 – 11:00	<b>Introduction to Transfer Pricing – Part 1</b> <ol style="list-style-type: none"><li>1. What is transfer pricing?</li><li>2. Why is transfer pricing important?</li><li>3. History and geography of transfer pricing around the world</li><li>4. Sources of transfer pricing law</li><li>5. Emerging scenario (including a brief introduction on BEPS)</li></ol>
11:00 – 11:45	<b>Introduction to Transfer Pricing – Part 2</b> <ol style="list-style-type: none"><li>1. Framework of the transfer pricing provisions under Income Tax Act, 1961 (“Act”)</li><li>2. Understanding of various terms and references –<ol style="list-style-type: none"><li>a. International Transaction</li><li>b. Associated Enterprise</li><li>c. Arm’s length</li><li>d. Transactions covered under Sections 80A; 80IA; 10AA of the Act</li></ol></li><li>3. Quiz / case studies</li></ol>
11:45 – 12:00	<b>Refreshments Break</b>
12:00 – 13:30	<b>Arm’s length principles</b> <ol style="list-style-type: none"><li>1. Meaning and significance</li><li>2. Comparability factors</li><li>3. Transfer pricing methods – Part 1<ol style="list-style-type: none"><li>a. Comparable Uncontrolled Price (CUP)</li><li>b. Resale Price Method (RPM)</li><li>c. Cost Plus Method (CPM)</li></ol></li></ol>
13:30 – 14:30	<b>Lunch</b>
14:30 – 15:30	<b>Arm’s length principles – Contd.</b> <ol style="list-style-type: none"><li>1. Transfer pricing methods – Part 2<ol style="list-style-type: none"><li>a. Transactional Net Margin Method (TNMM)</li><li>b. Other methods</li></ol></li><li>2. Quiz / case studies</li></ol>
15:30 – 15:45	<b>Refreshments Break</b>
15:45 – 17:00	<b>Comparability Analysis / Documentation – Part 1</b> <ol style="list-style-type: none"><li>1. Understanding the business of the group and the subject entity in the value chain.<ol style="list-style-type: none"><li>a. Impact of BEPS</li></ol></li><li>2. Identification of the International transactions and/or the Specified Domestic transactions</li><li>3. Functions, Assets and Risk (FAR) Analysis</li><li>4. Characterisation and Selection of the Tested party</li><li>5. Selection of the Most Appropriate Method</li><li>6. Quiz / case studies</li></ol>



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**Day 2 (12<sup>th</sup> December, 2015)**

Timing	Topics
10:00 – 11:30	Comparability Analysis / Documentation – Part 2 <ol style="list-style-type: none"><li>1. Transaction level vs. entity level analysis.</li><li>2. Segmenting relevant transactions.</li><li>3. Non-recurring and abnormal expenditure</li><li>4. Exchange loss/gain</li><li>5. Search for comparables</li><li>6. Use of Multiple year vs. Single year data</li><li>7. Historical vs Contemporaneous data</li><li>8. Arm's length range</li><li>9. Rule 10CA</li><li>10. Use of secret comparables</li><li>11. Economic adjustments</li><li>12. Quiz / case studies</li></ol>
11:30 – 11:45	Refreshments Break
11:45 – 13:30	Use of databases for search of comparables <ol style="list-style-type: none"><li>1. Sources of information</li><li>2. Verification of information</li><li>3. Using financial and legal databases</li><li>4. Quiz / case studies</li></ol>
13:30 – 14:30	Lunch
14:30 – 15:30	Documentation – Legal aspects <ol style="list-style-type: none"><li>1. Maintenance of prescribed documents</li><li>2. Transfer Pricing Study</li><li>3. Form 3CEB</li><li>4. Offences and penalties for non-compliance</li><li>5. Impact of BEPS on documentation</li><li>6. Quiz / case studies</li></ol>
15:30 – 15:45	Refreshments Break
15:45 – 17:00	Assessments and dispute resolution <ol style="list-style-type: none"><li>1. Assessments; reference to Transfer Pricing Officer (TPO)</li><li>2. Dispute Resolution Panel (TPO)</li><li>3. Advance Pricing Agreements (APAs)</li><li>4. Safe-harbour provisions</li><li>5. Mutual Agreement Procedure (MAP)</li><li>6. Quiz / case studies</li></ol>

**Day 3(13<sup>th</sup> December, 2015)**

Timing	Topics
10:00 – 11:00	Specified domestic transactions <ol style="list-style-type: none"><li>1. Background</li><li>2. Current issues in application</li><li>3. Quiz / case studies</li></ol>
11:00 – 11:45	Intra-Group Services – Part 1



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Timing	Topics
	<ol style="list-style-type: none"><li>1. Background</li><li>2. Common types of services</li><li>3. Choice of methods</li></ol>
11:45 – 12:00	Refreshments Break
12:00 – 13:30	Intra-Group Services – Part 2 <ol style="list-style-type: none"><li>1. Arm's length price (ALP)</li><li>2. Documentation</li><li>3. Quiz / case studies</li></ol>
13:30 – 14:30	Lunch
14:30 – 15:30	Intangibles and Cost Contribution Arrangements <ol style="list-style-type: none"><li>1. Background</li><li>2. Identifying intangibles</li><li>3. Choice of methods</li><li>4. Arm's length price (ALP)</li><li>5. Documentation</li><li>6. Quiz / case studies</li></ol>
15:30 – 15:45	Refreshments Break
15:45 – 17:00	Intra-Group Finance Transactions <ol style="list-style-type: none"><li>1. Background</li><li>2. Identifying transactions</li><li>3. Choice of methods</li><li>4. Arm's length price (ALP)</li><li>5. Documentation</li><li>6. Quiz / case studies</li></ol>

**Day 4(19<sup>th</sup> December, 2015)**

Timing	Topics
10:00 – 11:45	Practical Exercise – 1 - Captive ITES / BPO Unit in India
11:45 – 12:00	Refreshments Break
12:00 – 13:30	Practical Exercise – 2 - Manufacturing Unit in India, subsidiary of a foreign company
13:30 – 14:30	Lunch
14:30 – 15:30	Practical Exercise – 3 - Cost sharing arrangement between group companies
15:30 – 15:45	Refreshments Break
15:45 – 17:00	Practical Exercise – 4 - Indian company with subsidiary / branch outside India
17:00 – 17:30	Debrief and participant feedback



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**Registration Form**

Name: \_\_\_\_\_

Organisation's name: \_\_\_\_\_

Business address: \_\_\_\_\_  
\_\_\_\_\_

Mobile No.: \_\_\_\_\_

E-Mail ID: \_\_\_\_\_

IFA 2015-16 Membership No (If member): \_\_\_\_\_

Do you wish to know more about becoming a member of IFA India (Yes / No): \_\_\_\_\_

Do you want transport assistance\* (Yes / No): \_\_\_\_\_

**Payment Details:**

Cheque / DD / Transaction No. \_\_\_\_\_ dated: \_\_\_\_\_ drawn  
on (Bank) \_\_\_\_\_ for Rupees \_\_\_\_\_

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**\*Transport:** Transport assistance, from Noida City Center metro station to the venue and back, can be made available upon advance request and payment of additional charges at the time of registration.

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**Fee Payment Modes:**

- Cheque/DD favouring "International Fiscal Association - India Branch". The Cheque should be payable at par all over India. The DD should be made payable at New Delhi.
- Online Transfer (NEFT/RTGS) - In favour of "International Fiscal Association - India Branch" to IndusInd Bank Ltd, N 10-11, Sector- 18, Noida - 201301. Current A/c No.: 100003603083, IFSC: INDB0000036.

Please fill in this Registration Form and mail with payment to: IFA India Academy, C-56/9A, Sector 62, NOIDA, PIN- 201307, Uttar Pradesh. (Attention Ms. Preeti Tyagi). Scanned copy of the completed form can be mailed to [taxcourses@ifa-indiaacademy.in](mailto:taxcourses@ifa-indiaacademy.in) but registration will be confirmed only upon receipt of the fees.