

# Bombay Chartered Accountants' Society

## International Taxation Committee

Chairman: CA Mayur Nayak

Convenors: CA Deepak Kanabar, CA Rutvik Sanghvi, CA Siddharth Banwat

Programme Co-ordinator: CA Shreyas Shah, CA Akshay Kenkre, CA Darshak Shah

### 3 DAYS WORKSHOP ON ADVANCED TRANSFER PRICING

Dear Member,

With behemoth efforts of the tax authorities worldwide to bring-in consistency and transparency, the application of arms length principle remains an important window through which income or expense between associated enterprise can be justified. BCAS is ready with its 9<sup>th</sup> Intensive Study Course on Advanced Transfer Pricing to be conducted in classroom style on 3 days spread over with 6 sessions touching upon important as well as recent developments on transfer pricing regulations.

The focus of this workshop will be more on practical application of arms length principles as compared to the theory of the subject. In view of this, we request participants to acquaint themselves with the theoretical knowledge of transfer pricing regulations, prior to attending this workshop. Post this workshop, the participants will be able to decide on the following:

- Knowing FAR of comparable companies and, whether or not, it is same or similar with the tested party;
- Knowing when and how to conduct TP adjustments and whether or not, it would be justified in the court of law; and
- Knowing relevance of TP strategies and building cross-border FAR at the planning stage.

<b>Day &amp; Date</b>	18-19-20 April 2019 (Thu-Fri-Sat)	
<b>Venue</b>	BCAS Hall, 7, Jolly Bhavan No.2, New Marine Lines, Mumbai 400020	
<b>Time</b>	Sessions from 10:00 a.m. to 6:00 p.m. Breakfast from 9:15 a.m. – 10:00 a.m. Lunch from 1:30 p.m. – 2:30 p.m. Two Coffee Breaks of 15 min each in-between sessions	
<b>Fees</b>	<b>BCAS Member</b>	<b>Non-Member</b>
	<b>Rs. 7,500/-</b>	<b>Rs. 9,350/-</b>
	The above fee includes GST, contribution of Rs. 50/- towards BCAS Foundation, breakfast, lunch, cost of study material, tea, coffee and refreshments.	

Sr. No.	Sessions	Particulars	Speakers
Day 1	<b>Basic Concepts</b>	Fast-track understanding recent developments on transfer pricing, including OECD Transfer Pricing Guidelines, 2017. Change in concept from ALP to ALP + Market base.	CA Vispi Patel
	<b>Group-based Case Study on FAR determination</b>	Case Study on identifying the Functions performed, Assets utilised and Risks borne-by (FAR) of comparables from the study and review of Annual Reports for various industries.	CA Darpan Mehta CA Abhishek Duggar
Day 2	<b>Group-based Case Study on Adjustments</b>	Case Study on TP adjustments (such as working capital adjustment, risk adjustment, etc.) along with case laws support or disapprove the same.  Discussion on subject matter such as: <ul style="list-style-type: none"> <li>- Practical difficulty in obtaining comparables for outliers and its alternatives:</li> <li>- service provider having potentially high intangibles,</li> <li>- low-functional risk entities (such as toll manufacturer),</li> <li>- determining royalty for brand, trademark, know-how, use of ecommerce infrastructure, network or facilities, and</li> <li>- determining present / future economic outcome for value-creation, etc.</li> </ul>	CA Vaishali Mane
	<b>Conceptual discussion on SAAR: interest deductibility and secondary adjustments</b>	<ul style="list-style-type: none"> <li>- Understanding the tax provisions on interest deductibility and secondary adjustments along with the Case Study on how to comply with the same</li> </ul>	CA Hemali Thakkar
	<b>Conceptual discussion on Attribution of Profits to PE</b>	<ul style="list-style-type: none"> <li>- Case Study on attribution principles and its changing role</li> </ul>	CA Madhav Kanhere
Day 3	<b>Conceptual discussion on CBCR and Master File</b>	Understanding the tax provisions on CBCR and Master File, Case Study on how to comply with CBCR and Master File report	CA Bhavesh Dedhia CA Anjul Mota
	<b>Conceptual discussion on Advance Pricing Agreements</b>	Understanding the tax provisions on APA	CA Mehul Shah

Date :	
<b>Enrolment Form</b>	
<b>3 DAYS WORKSHOP ON ADVANCED TRANSFER PRICING</b>	
Name :	
Address :	
E-mail :	Mobile :
BCAS Membership. No. (If Applicable) :	
<b>GSTN:</b> <b>Please provide your GST Provisional ID with a copy of certificate at the time of transaction. No amendment will be made in the Invoice or Receipt on a later date.</b>	
Tel. (O) :	Tel. (R/M) :
Food Preference (Tick any one preference): Veg ....., Jain .....	
Cash/Draft/ Cheque no :	
Drawn on : _____ Bank	
Dated :	
Amount Rs.	

Date:

Signature of Participant

Note:

Payment Mode can be: Cheque / Demand Draft / Cash or Electronic Card (at BCAS office only).

Please mention your name and membership number (if applicable) on the reverse side of the cheque/ Demand Draft. Kindly note that the cash counter timings are from 10.30 a.m. to 5.30 p.m. on Monday to Saturday. The lunch time is 1.30 p.m. to 2 p.m. Participants are requested to co-operate in this regard.

The Cheque/ DD will be in the name of **“Bombay Chartered Accountants’ Society”**. Your participation will be confirmed only after the realization of payment at BCAS, for which a receipt will be provided for your reference.

Cancellation Policy: Kindly note that no refund will be given in case of cancellation for any reason and no substitute will be allowed, once the enrolment form is submitted.

**7, Jolly Bhavan No. 2, Ground Floor, New Marine Lines, Mumbai- 400020. Tel. 61377600.**