

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 Maitri Ahuja

3 DAYS WORKSHOP ON ADVANCED TRANSFER PRICING

Dear Member,

With behemoth efforts of the tax authorities worldwide to bring-in transparency, the application of arms length principle remains an important window through which income or expense between related parties can be justified. BCAS is ready with its 8th Intensive Study Course on Advanced Transfer Pricing to be conducted in classroom style on 3 consecutive days ; spread over 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.

Day & Date	Thursday 5 th April 2018, Friday 6 th April 2018 & Saturday 7 th April 2018	
Venue	BCAS Hall , 7, Jolly Bhavan No.2, New Marine Lines, Mumbai 400020	
Time	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	
Fees	BCAS Member	Non-Member
	Rs.5,550/-	Rs.6,350/-
	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
Day 1	Session 1 (Conceptual Theory)	Fast-track understanding recent developments on transfer pricing, including OECD Transfer Pricing Guidelines, 2017
	Session 2 (Practical Workshop)	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.
Day 2	Session 3 (Practical Workshop)	Case Study on TP adjustments (such as working capital adjustment, risk adjustment, etc.) along with case laws support or disapprove the same.
	Session 4 (Conceptual Workshop)	Practical difficulty in obtaining comparables and its alternatives, service provider having potentially high intangibles, low-functional risk entities (such as toll manufacturer), etc.

Day 3	Session 5 (Practical Workshop)	Case Study on designing FAR (at planning stage) for various industries and enabling tax-efficient and sustainable business model in light of Transfer pricing, MLI and GAAR.
	Session 6 (Conceptual Theory)	Recent decisions on matters discussed above

Your Society has planned this Workshop to understand the gamut of issues related to ALP concept. The idea is to provide a practical learning with a case-study based format. Faculty will comprise of senior professionals having expertise in the field of Transfer Pricing.

Date :	
Enrolment Form	
3 DAYS WORKSHOP ON ADVANCED TRANSFER PRICING	
Name :	
Address :	
E-mail :	Mobile :
BCAS Membership. No. (If Applicable) :	
GSTN:	
Please Note: Request you to submit your GST Certificate with Enrolment Form	
Food Preference: Veg, Jain	
Tel. (O) :	Tel. (R/M) :
Fax:	
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.