



### Key learning benefits:



Understand the importance of international transfer pricing to multinational enterprise groups and tax administrations



Apply the arm's length principle in practice, based on the OECD Transfer Pricing Guidelines



Understand the purpose and content of transfer pricing documentation and gain better insight into international guidance on this subject



### **Course overview**

Transfer pricing is one of the most important tax issues in the international arena of enterprises and tax administrations.

This course will examine transfer pricing theory and overarching legal framework, the role of the OECD Transfer Pricing Guidelines, and recent and planned evolution of the legislative landscape in the GCC region.



### Meet your course leader

Filip Vukovic
Director | Head of Transfer Pricing
KPMG Lower Gulf Limited

Filip heads KPMG Lower Gulf's Transfer Pricing practice and is based in Dubai. He has over 15 years of international experience working in various locations in Europe and MESA.

Filip has significant expertise in value chain analysis, business optimization and restructuring, operational transfer pricing topics, and the deployment of technology solutions.

Previously based in Europe, he was assigned to various Transfer Pricing roles in France, Luxembourg, Russia (and the CIS region), Serbia (and the Balkans region), and Spain.

He has worked extensively in energy, resources and technology, with significant exposure to private equity and financial services.

His specialty is to advise multinational companies in building sustainable operating models and facilitating management of internal organizational structure.

### **(**

### **Course structure**

This course has been designed to be highly interactive, involving:

- —Group activities
- Engaging visual strategy
- A non-linear learning approach
- Application-driven exercises and evaluation



### Who should attend

The course is intended for middle and senior level management professionals in various sectors, domains and industries.

It is highly recommended for:

- Executive management
- Business executives
- Procurement
- Legal
- Tax personnel
- Tax managers
- Transfer pricing advisors and consultants





### Day one

- —Introduction to transfer pricing
- —The legal framework: OECD framework vs jurisdiction specific rules
- —Transfer pricing in the GCC region
- —The value chain and its impact on transfer pricing
- —Functional analysis
- —Comparability analysis how to do it?
- —Substance over form concept in TP
- —IP considerations in a post BEPS environment
- —Transfer pricing methods
- —Applying the arm's length principle
- —Transfer pricing adjustments
- Transfer pricing dispute avoidance and resolution
- —Transfer pricing documentation
- What's coming next: BEPS 2.0 and its impact on Transfer Pricing



# Transfer pricing

6 April 2020 8:30am-4:00pm Dubai, UAE

Early bird (before 6 March 2020)*	Participant fee*
USD 799	USD 999

\* Please note that the fee quoted is exclusive of VAT and the fees for the course shall be increased by the quantum of VAT, as applicable under the law.

All registrations are subject to our terms and conditions which are available at

http://kpmgbusinessacademy.kpmguae.com/TermsandConditions.aspx

. By submitting your registration you agree to be bound by the terms and conditions in full.



### Three ways to register:



#### Certificate

Participants who attend all sessions will be awarded a KPMG certificate of attendance.

### **Payment**

To reserve a seat at our courses, please complete a registration form and pay the full fees before the due date. All registrations are subject to acceptance by KPMG and will be confirmed with you in writing.

### Cancellation

If, having registered and paid for a place, you are unable to attend the course, a substitute delegate is welcome to attend in your place. Fees canceled seven days or less before the course begins are payable in full.

KPMG reserves the right to cancel this course, change its date or alter the venue, speakers or topics.

## **Customized training** solutions

To create a more tailored learning experience, you may want to run this course in-house. Please contact Saravanan Selvan to discuss further:

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