

Invitation to the Deloitte Transfer Pricing Events

Transfer Pricing Documentation – How to cope with the challenges post-BEPS?



 [Forward to a colleague](#)

Get the latest update from our speakers

Zurich: 24 November 2014, 07:45 - 10:00 am (Presentation start 8:30 am)

Geneva: 26 November 2014, 8:00 - 10:00 am (Presentation start 8:30 am)

We are pleased to invite you to the **fourth Transfer Pricing Breakfast of 2014**.

On 16 September the **OECD published its final revision to Chapter V of the Transfer Pricing Guidelines, dealing with Transfer Pricing Documentation**. It is clear that the new guideline will change the documentation process for MNEs fundamentally and require most companies to gather and provide tax authorities with **unprecedented transparency** regarding the financial results of a group's global transfer pricing policies. You may want to consider **how the new documentation requirements will impact transfer pricing strategies**.

Detailed event topics

As part of our Transfer Pricing event, our Deloitte expert Jeroen Lemmens and other members of the Deloitte TP team will discuss:

- Detailed definition of the new documentation requirements;
- The impact of the Country-by-Country Reporting as a tax risk assessment tool;
- Identify a strategy to cope with the challenges from these new rules from a MNEs perspective;
- Present available documentation tools to support your documentation efforts;
- Practical aspects on the timing of the implementation of the new rules.

Our speakers will share their experience on these challenging topics and you will have the

opportunity to ask questions on the day but please feel free to submit any questions in advance to **Sophie Kubik**.

Zurich

Date	Monday, 24 November 2014
Venue	Deloitte AG General Guisan-Quai 38 8002 Zurich
07:45 - 08:30 am	Arrival, registration and welcome coffee
08:30 - 10:00 am	Presentation by Jeroen Lemmens and other members of the Deloitte TP team - Q&A session
Contact	Isabelle Buecheler , +41 (0)58 279 7771

Geneva

Date	Wednesday, 26 November 2014
Venue	Deloitte SA ICC – Entrance H – 5th floor Route de Pré-Bois 20 1215 Geneva 15
08:00 - 08:30 am	Arrival, registration and welcome coffee
08:30 - 10:00 am	Presentation by Jeroen Lemmens and other members of the Deloitte TP team - Q&A session
Contact	Laure Golly , +41 (0)58 279 8129

REGISTER for the Transfer Pricing Breakfast in Zurich (24 Nov 2014)

REGISTER for the Transfer Pricing Breakfast in Geneva (26 Nov 2014)

Your speaker

Jeroen Lemmens, Partner, Transfer Pricing, Deloitte AG

Jeroen is partner in Deloitte's Transfer Pricing Practice in Switzerland with more than 14 years experience in the field of Transfer Pricing.

Jeroen worked as Transfer Pricing Partner for Deloitte in Belgium and Germany. Jeroen's in depth Transfer Pricing experience combined with solid industry knowledge allow him to focus his advice on the companies' specific business/commercial needs, their Transfer Pricing requirements as well as tax requirements. Prior to joining Deloitte, Jeroen worked many years in Industry.

Highlights of Relevant Experiences

Jeroen advises multinational companies on Transfer Pricing and global structuring of

intercompany transactions.

His experience includes Transfer Pricing Compliance, Transfer Pricing Automation and Transfer Pricing Planning. In addition, he has a vast experience in Audit Defence cases and MAP / Arbitration procedures across different industries.

Your value in participating

- Our speakers will elaborate on recent transfer pricing developments from an OECD/BEPS perspective, while primarily focusing on implications for Swiss based companies. As part of the presentation the speakers will identify the potential practical implications of the increased financial transparency for a MNEs documentation approach.
- As it refers to the Country-by-Country reporting MNEs should be aware of the possible conclusions tax administration may draw and how best mitigate them with a smarter transfer pricing documentation.
- We shall compare a decentralised and centralised documentation approach under the new documentation requirements.
- Get a look and feel about the Deloitte Elements Documentation tool newly developed to support MNEs in their documentation process.
- When discussing different topics we will apply a practitioner's view and aim at providing practical guidance to in-house specialists on transfer pricing related tax risks that can be identified, managed and mitigated in tomorrow's tax environment.

We look forward to welcoming you to one of these events. If you believe someone within your organisation would be interested in attending this presentation, please do not hesitate to forward this invitation.

Best regards,

Hans Rudolf Habermacher

Transfer Pricing Practice
Leader, Partner
Deloitte AG

© 2014 Deloitte AG. All rights reserved.

In this invitation references to Deloitte are references to Deloitte AG, a subsidiary of Deloitte LLP. Deloitte LLP is the United Kingdom member firm of Deloitte Touche Tohmatsu Limited ("DTTL"), a UK private company limited by guarantee, whose member firms are legally separate and independent entities. Please see www.deloitte.com.ch/about for a detailed description of the legal structure of DTTL and its member firms.

Deloitte AG is recognised by the Federal Audit Oversight Authority and the Swiss Financial Market Supervisory Authority.

[Home](#) | [Terms of Use](#) | [Privacy](#) | [Cookies](#)

Not interested anymore? [Unsubscribe](#) instantly.