



Transfer Pricing

Principles and Implementation
Considerations

3-4 July 2019 - Limassol

Description

On July 10, 2017 the OECD published the Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations (hereinafter – the "Transfer Pricing Guidelines"), updated within the framework of the BEPS (Base Erosion and Profit Shifting) project. This was the biggest update of the Transfer Pricing Guidelines since their publication in 1979 and significant changes affected many sections of the document. The main goal of the training is to equip the attendees with solid theoretical knowledge of the Transfer Pricing Guidelines and practical skills for, among others, the following cases:

- Structuring of pricing policy for controlled transactions;
- Preparation of TP documentation;
- Defending positions during tax audits and in courts.

Features of the training:

- The course provides a combination of theoretical aspects and business cases, including implementation of certain complex concepts, with a significant number of examples and practical exercises.

Training will be held by Deloitte experts who are highly experienced in the field of transfer pricing and international tax. The training event will be held in Cyprus, which itself is in the process of introducing comprehensive transfer pricing regulations.



Who should attend the course?

The training is targeted at employees of Multinational Enterprises who work in the areas of finance, accounting and taxation, such as CFOs, chief accountants, tax directors and managers, and TP specialists.

Programme

Registrations and Coffee: 09:00-09:30

Workshop: 09:30-17:30

Event duration: 12,5 hrs

Dates and Locations:

3-4 July 2019 Limassol

(*Crowne Plaza Hotel*)

Facilitators:

Vladimir (Willy) Elizarov | Partner | Deloitte Consulting LLC | Russia

Alexey Sobchuk | Director | Deloitte Consulting LLC | Russia

Cost: €380 (+VAT) per person (*including lunch and coffee breaks for both days*)

Language:

Russian

Workshop Content

The seminar will go through the various provisions of the OECD TP Guidelines and explain their application in practice:

- The main principles of TP and their practical application
- TP methods and their practical application:
 - Comparable uncontrolled price method
 - Resale price method
 - Cost plus method
 - Comparable profitability method
 - Transactional profit split method
- Comparability adjustments
- Transactions involving intangibles
- Approaches to TP disputes resolution
- Three-tiered approach to TP documentation
- Features of intragroup service transactions
- Financial transactions
- TP aspects of business restructuring

Agenda

Wednesday, 3rd July 2019

Time	Subject
09.00–09.30	Welcoming coffee
09.30–10.45	<ul style="list-style-type: none">• The main principle of TP and its practical application
10.45–11.00	Coffee break
11.00–12.00	<ul style="list-style-type: none">• TP methods and features of their practical application:<ul style="list-style-type: none">• Comparable uncontrolled price method
12.00–13.00	Lunch
13.00–14.15	<ul style="list-style-type: none">• TP methods and features of their practical application:<ul style="list-style-type: none">• Resale price method• Cost plus method
14.15–14.30	Coffee break
14.30–15.45	<ul style="list-style-type: none">• TP methods and features of their practical application:<ul style="list-style-type: none">• Comparable profitability method• Transactional profit split method
15.45–16.00	Coffee break
16.00–17.30	<ul style="list-style-type: none">• Practical exercises

Thursday, 4th July 2019

Time	Subject
09.00–09.30	Welcoming coffee
09.30–10.45	<ul style="list-style-type: none">• Comparability adjustments
10.45–11.00	Coffee break
11.00–12.00	<ul style="list-style-type: none">• Transactions involving intangibles
12.00–13.00	Lunch
13.00–14.15	<ul style="list-style-type: none">• Approaches to TP disputes resolution• Three-tiered approach to TP documentation
14.15–14.30	Coffee break
14.30–15.45	<ul style="list-style-type: none">• Features of intragroup service transactions• Financial transactions
15.45–16.00	Coffee break
16.00–17.30	<ul style="list-style-type: none">• TP-aspects of business restructuring• Practical exercises

Facilitators



Vladimir (Willy) Elizarov
Partner

Professional experience

Vladimir is a partner with Deloitte Moscow's transfer pricing practice, serving clients in different industries across the CIS countries.

During his career in consulting, which started in 2003, Vladimir has provided transfer pricing, valuation and business modeling services to clients spanning multiple industries. Prior to joining Deloitte, he was the transfer pricing leader at another Big Four firm in Israel. Prior to joining the Israeli practice, Vladimir was a senior manager in the US Southeast Sub-Area Transfer Pricing practice, based in Atlanta, Georgia, USA. Vladimir has been involved in large-scale projects related to transfer pricing and tax planning, as well as preparation of transfer pricing documentation for global financial services institutions in the Americas, Europe and Asia-Pacific Region. In addition to his transfer pricing experience, Vladimir has gained considerable valuation experience, including derivatives valuation. He also has extensive experience in business modeling and intangible assets transactions.

Education

Master of Science in Economics (Finance) – Technion, Israel Institute of Technology
Bachelor of Art, Economics and Management - Technion, Israel Institute of Technology



Alexey Sobchuk
Director

Professional experience

Alexey is a Director in transfer pricing group at Deloitte CIS and has 12 years of experience in transfer pricing consulting.

Alexey provided various consulting services with respect to transfer pricing to leading Russian and international companies. Particularly, he was engaged in developing of financial and pricing models, transfer pricing policies, documentations and Advance Pricing Arrangements (APA) and Mutual Agreement Procedures (MAP) etc.

Alexey also worked as Deputy Head of Transfer Pricing and International Cooperation Department of the Russian Federal Tax Service. On this position Alexey coordinated developing of various types of documents required for the practical implementation of the new Transfer Pricing legislation in Russia. He also represented Federal Tax Service in negotiations with taxpayers with respect to APA, participated in negotiations with foreign tax authorities etc. Alexey also was a member of various working groups established by Federal Tax Service jointly with other government agencies (Ministry of Finance, Federal Customs Service, Rospatent) to discuss issues related to TP.

Education and professional qualification

Degree in Electronics Engineering, Moscow State University of Fine Chemical Technology named after Lomonosov;

Degree in Law, Moscow State Institute of International Relations (MGIMO).

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