



Introduction to Transfer Pricing: Tax Considerations

When?

Module 101 - 18 March 2013

Module 102 - 19 March 2013

Each Module lasts from 9:30 until
17:30

Where?

19-A Khreshatyk Street (Ernst
and Young Academy of Business)

Language: Russian

*A program in English might be conducted
separately depending on the number of
English-speaking participants.*

The cost of attendance is
UAH 6,000 per person per
Module or UAH 11,000 for both
Modules (any VAT to be charged
additionally). Participants from
the same company might benefit
from additional discounts.

To register or ask any questions
please contact **Anastasiya
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+380 (44) 490 3000.

To help our clients in preparations for the new transfer pricing requirements Ernst & Young has launched a specialized training program for tax and financial specialists.

The training program is designed for both, inexperienced professionals and people with previous exposure to transfer pricing. The first Module 101 provides basic information about Ukrainian transfer pricing rules and the OECD Transfer Pricing Guidelines. The Module gives an understanding of transfer pricing methods and the arm's length principle.

The second Module 102 is prepared for professionals with advanced knowledge of transfer pricing. It concentrates on practical situations, functional and operational issues. It also focuses on the role of transfer pricing specialists in the process of decision-making of the company.

Who should attend?

- ▶ CFO
- ▶ Tax Director
- ▶ Tax Manager
- ▶ Chief Accountant
- ▶ Employees responsible for pricing policy

Speakers

Ernst & Young's most experienced transfer pricing Partners and Senior Managers will present at the training.

Training Methodology

The training program will focus on interaction with participants and will include a number of case studies.

Certificates

Certificate of the Ernst and Young Academy of Business.

Objectives

- ▶ To introduce core principles of transfer pricing based on the effective and anticipated Ukrainian transfer pricing legislation and the OECD Transfer Pricing Guidelines.
- ▶ To introduce transfer pricing methods and demonstrate their application in practical situations.
- ▶ To develop basic practical skills in conducting functional analysis and selecting the most appropriate transfer pricing method considering the functional profile of the company.
- ▶ To develop skills in performing benchmarking studies.
- ▶ To introduce options for preventing/resolving disputes with the tax authorities on transfer pricing issues.
- ▶ To define action plan for successful preparation for the new transfer pricing rules.

All theoretical aspects of the training program are supported with the practical cases.

Agenda

Module 101

- ▶ Transfer pricing principles and its role for the world's economy.
- ▶ Ukrainian transfer pricing regulations: content and problems.
- ▶ Related parties (interdependent parties). Arm's length principle.
- ▶ Practical recommendations on verification of interdependent parties and controlled transactions.
- ▶ Transfer pricing methods.
- ▶ Functional analysis as the basis for transfer pricing method selection.
- ▶ Preparation for the new rules: action plan.
- ▶ Case Study.

Module 102

- ▶ Case Study on selection of a transfer pricing method (based on the knowledge acquired within Module 101).
- ▶ Transfer pricing specifics in transactions with IP, service transactions and financing transactions.
- ▶ Review of a benchmarking study example.
- ▶ Preparation of transfer pricing documentation.
- ▶ Development of the effective transfer pricing function within a company.

Individual Corporate Training

- ▶ At your request, we can conduct an individual transfer pricing training for employees of a specific company (group of companies) with a focus on the company's industry.
- ▶ Besides the basic transfer pricing principles and practical issues, the individual corporate training will include detailed analysis of the company's transactions preliminary agreed with the client.
- ▶ Specifically, we will analyze the transactions and will provide our recommendations with respect to applicable transfer pricing methods. We will also comment on possible sources of information of the market prices and will outline an action plan for elimination / mitigation of the identified transfer pricing risks.
- ▶ The place and date of the training will be separately agreed with the client.
- ▶ For additional information please contact Igor Chufarov at Igor.Chufarov@ua.ey.com or by phone: +380 (44) 492 8231.