

Day 2 (continued)

- The comparability analysis process
 - The 8-step process
 - The 5 comparability factors: special focus on the functional analysis
- The comparability analysis in practice
 - The comparables selection process: a practical example
- Timing issues

Transfer Pricing Methods

Issues and aspects to be considered before choosing and applying a transfer pricing method

Day 3

Transfer Pricing Methods (continued)

- The traditional transaction methods
 - Comparable uncontrolled price (CUP)
 - Cost plus
 - Resale price
- The transactional profit methods
 - Transactional net margin
 - Profit split

Case study on Comparability and Transfer Pricing Methods

Day 4

Documentation

- The role of transfer pricing documentation
- What information should be included in the documentation?
- Recent developments
- Practical guidance

Audits and risk assessment

- Introduction to audits and risk assessment
- Risk assessment and selection of taxpayers for examination
- Planning for

Day 5

Dispute Avoidance and Resolution

- The importance of dispute resolution
- Available methods of dispute resolution
- Understanding dispute avoidance mechanisms
- Practical aspects

Establishing Transfer Pricing Capability in Developing Countries

- Preliminary considerations
- Having a strategy, setting the vision, mission, plans, objectives and measuring performance
- Establishing a dedicated transfer pricing unit
 - Structure of the transfer pricing unit (including functions, competencies and responsibilities)
 - How to develop and retain staff (expertise)
- Undertaking a gap analysis and filling the gaps
 - Identifying capacity gaps
 - Preparing a plan to fill the gaps
 - Implementing and reviewing the plan
- Quality assurance and governance
- Sources of information

Country Practices and Experiences

