

UN Course on Transfer Pricing
Comparability and Transfer Pricing Methods
Antananarivo, Madagascar
14 November 2013

Taxation of Profits (AMM)

Day 1, Monday, 14 November 2013

9am - 12pm: Introduction to the course. 12pm - 1pm: Lunch. 1pm - 2pm: Overview of the course. 2pm - 3pm: Case study. 3pm - 4pm: Break. 4pm - 5pm: Summary and conclusions. 5pm - 6pm: Dinner. 6pm - 7pm: Free time. 7pm - 8pm: Presentation of the course materials. 8pm - 9pm: Free time. 9pm - 10pm: Dinner. 10pm - 11pm: Free time. 11pm - 12pm: Dinner.

+ay " , Tuesday, 11 November "#1\$.cont/d0	
11.1-am – 1pm	Comparability Challenges in Africa and Approaches in the ATA2 Suggested Approach to +rafting Transfer Pricing 4egislation
1pm – *pm	
*pm – 3.30pm	Case study . ompara&ility 4nalysis
3.30pm – /pm	
/00 pm – -.00pm	Country %5periences , 6ambia
+ay 7 , 8ednesday, 1\$ November "#1\$	
9am – 10.30am	Transfer Pricing Methods <ul style="list-style-type: none"> • 5ss es and aspects to &e considered &efore choosing and applying a transfer pricing method
10.30am – 11am	
11am – 1*./-am	Transfer Pricing Methods .cont/d0 The traditional transaction methods <ul style="list-style-type: none"> • . ompara&le ncontrolled price 0. 671 • . ost pl s • 8esale price
1*./-am – 1./-pm	
1./-pm – 3.30pm	Transfer Pricing Methods The transactional profit methods <ul style="list-style-type: none"> • Transactional net margin • 7rofit split
3.30pm – /pm	
/pm – -.1-pm	Country %5periences , Tan9ania and Madagascar
9pm	*ala dinner , Colbert : otel
+ay 4 , Thursday, 1! November "#1\$	
9am – 11am	Case study . ompara&ility and Transfer 7ricing : ethods
11am – 11.30am	
11.30am – 1pm	Approach to the TP Methods in the ATA2 Suggested Approach to +rafting Transfer Pricing 4egislation
1pm – *pm	

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*pm – 3.1-pm

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