

Workshop on “Introduction to Transfer price b- laws & its methods”

Institut des Finances Basil Fuleihan – 23 April 2019

Trainer: Mr. Enrique DÍAZ TONG

TP Consulting’s founder and partner (transfer pricing specialized network, with offices in 30 countries). MBA from ESAN University. Lawyer by the Pontifical Catholic University of Peru, with specialized studies in Tax Law at this University. Postgraduate Professor of the Transfer Pricing course at the ESAN University (Peru - since 2002). He had been a visiting professor of the Transfer Pricing course at the University of Leiden (International Tax Center - Netherlands). Co-author and coordinator of the books: "Transfer Pricing in Iberoamerica, USA and United Kingdom" (Thomson Reuters, 2019 and 2018), "Transfer Pricing in Iberoamerica" (Thomson Reuters, 2017) and "Transfer Pricing in Latin America" (Thomson Reuters, 2016).

AGENDA

8:30 - 9:00	Reception Participants and Welcoming notes
9:00-10:15	Introduction: Arm’s Length-Principle Case 1: Asitic Petroleum Co / Google
10:15-11:00	Methods: Overview of the 5 methods Case 2: CUP / Resale
11:00-11:30: Coffee break	
11:30-12:20	TP and Custom Valuations Separate methods Case 3: The line
12:20-01:20	BEPS. Ac 13-Local, Master and CbC Case 4: Uber
1:20-2:20	Exports / Imports:6th method Case 5: Switzerland
2:20-2:30	Closing remarks and Evaluation