




NETWORKING
SEMINARS

Practical Approaches to Common Transfer Pricing Concepts

May 16-17, 2019

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This introductory seminar provides participants with a working knowledge of key transfer pricing concepts and an understanding of steps needed to document intercompany transactions. Earn 15 CE Credits

This seminar covers the following:

- **Primary transfer pricing methodologies and typical fact patterns**
- **Gathering and analyzing internal and external data**
- **Preparing functional analyses**
- **Creating/updating benchmarking data**
- **Step-by-step preparation of a transfer pricing report**
- **Master, country and local file preparation**
- **Country-by-country reporting**
- **Handling transfer pricing controversies**

Chairperson: Klaus Oehring, Transfer Pricing Consulting, Houston, TX

Practical Approaches to Common Transfer Pricing Concepts

Chairperson

Klaus Oehring, Transfer Pricing Consulting, Houston, TX

Thursday, May 16, 2019

8:15 AM **Registration and Continental Breakfast**

8:45 AM **Welcome and Overview of Transfer Pricing**

9:15 AM **Analyzing Intercompany Transfers of Tangible Property**

- Types of manufacturers
- Types of distributors
- Choice of transfer pricing methods
- Practical examples

Bob Bamsey, Senior Manager, RSM, Minneapolis, MN

10:45 AM Coffee Break

11:00 AM **Analyzing Intercompany Services**

- Types of services
- Shareholder activities and intra-group services
- Allocation keys
- Types of service providers
- Coordination with OECD Guidelines
- Practical examples

Bob Bamsey, Senior Manager, RSM, Minneapolis, MN

12:30 PM Luncheon

1:15 PM **Analyzing the Intercompany Transfers of Intangible Property**

- Defining intangible property
- Royalty determination
- Pricing intangible transfers
- Coordination with OECD Guidelines
- Developing a supportable IP structure
- Practical examples

Patrick McColgan, Managing Director, Duff & Phelps, Atlanta, GA

2:15 PM **Analyzing Intercompany Financial Transactions**

- Understanding the changing intercompany finance environment
- Developing a supportable intercompany finance policy
- Practical examples and documentation best practices

Kerim Keser, Managing Director, Duff & Phelps, Munich, Germany

3:15 PM Coffee Break

3:30 PM **Panel - Contemporaneous Documentation**

- Country-by-Country Reporting (CbCR)
- Strategies for optimal implementation of global documentation

Klaus Oehring, Transfer Pricing Consulting, Houston, TX

Bob Bamsey, Senior Manager, RSM, Minneapolis, MN

Patrick McColgan, Managing Director, Duff & Phelps, Atlanta, GA

Kerim Keser, Managing Director, Duff & Phelps, Munich, Germany

Friday, May 17, 2019

8:00 AM Continental Breakfast

8:30 AM **Preparing a Transfer Pricing Documentation**

- Financial analysis
- Risk-function analysis

Klaus Oehring, Transfer Pricing Consulting, Houston, TX

10:30 AM Coffee Break

10:45 AM **Preparing a Transfer Pricing Study – continued**

- Economic analysis
- Case study – benchmarking analysis

Klaus Oehring, Transfer Pricing Consulting, Houston, TX

11:30 PM **Practical Approaches to Common Transfer Pricing Documentations**

- Examples
- Case Studies

Klaus Oehring, Transfer Pricing Consulting, Houston, TX

12:15 PM **Drafting a Transfer Pricing Report**

- Examples

Klaus Oehring, Transfer Pricing Consulting, Houston, TX

2:00 PM Seminar Concludes

This unique seminar that combines theory with hands-on practical applications. This transfer pricing seminar focuses on the various aspects of the transfer pricing documentation process. Using real-life examples, case studies, and templates, instructors show practical approaches to compile, analyze and manage common intercompany transactions.

This introductory seminar provides participants with a working knowledge of key transfer pricing concepts and an understanding of steps needed to document intercompany transactions.

During the first day, the seminar focuses on the principles and methodologies of transfer pricing. The next day, participants go over examples and case studies to reinforce key transfer pricing concepts.

Participaing Speakers



Klaus Oehring is a CPA with 35 years of industry and public accounting experience. He practices in all areas of U.S. income taxation with special emphasis on international tax, transfer pricing and related tax accounting matters including ASC 740. Klaus has extensive experience preparing U.S. and foreign contemporaneous transfer pricing documentation and handling Advanced Pricing Agreements, Competent Authority and tax audit defense matters.



Bob Bamsey leads RSM's transfer pricing group in the Central Region. Bob has led a variety of domestic and international projects, analyzing transactions involving intellectual property, services, supply chain arrangements, intercompany loans, and factoring. Bob has also been intimately involved with in-house transfer pricing planning, litigation support, audit defense, annual documentation management, and intercompany agreement development.



Dr. Kerim Keser is a managing director in the Munich Office and leads Duff & Phelps' German, Swiss and Austrian Transfer Pricing activities, leveraging 15 years of transfer pricing experience in consulting firms and at the Australian Taxation Office (ATO). Kerim has extensive experience advising or auditing companies of all industries, including automotive, consumer products, pharmaceuticals, technology and financial services. Kerim has a results-driven approach, developing transfer pricing solutions for companies considering their size, complexity and industry's best practices.



Patrick McColgan is a managing director in Duff & Phelps' Atlanta office and part of the transfer pricing team. He has a strong focus on assisting growth companies with their global transfer pricing needs through the design of defensible and pragmatic solutions. Patrick has more than 12 years of transfer pricing experience and has worked across a number of industries including automotive, chemical, consumer products, medical products, pharmaceutical, software, internet, and manufacturing.

Who Should Attend: This seminar is for corporate tax, accounting and finance executives, transfer pricing specialists, economists, corporate counsel, CPAs, controllers, treasurers, tax attorneys. There is no advance preparation or prerequisites for this group-live seminar.

Continuing Professional Education (CPE) Credits:

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Field of Study: Taxes
Instructional Delivery Method: Group Live
Recommended CPE credit: **15 CPE/CLE Credits**
Prerequisites: None
Program level: Basic
Advance preparation: None

Continuing Legal Educational (CLE) Credits:

State MCLE Boards will have final approval on the number of CLE credits. This course is transitional and non-transitional and is appropriate for experienced attorneys and newly admitted attorneys.

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