

Best Practices in Audit Management and Transfer Pricing!

Key Issues in Global Transfer Pricing

Get Latest Regulatory Updates and Practical
Guidance for Successful Audit Defense

Our Faculty

Get Practical Advice from
Leading Industry Experts

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PLUS! Take advantage of our
optional half-day workshop!

Canada-U.S. Side of Transfer Pricing:
Examine all aspects of transfer pricing
and any other possible tax issues
between the U.S. and Canada.

September 28 and 29, 2010
Optional Workshop: September 30, 2010
CHICAGO, ILLINOIS

Prepare for Increasing Global Enforcement

- ✓ Learn about recent developments in transfer pricing in the U.S., Canada, Europe, and Asia
- ✓ Gain insights into practical approaches and lessons learned from transfer pricing legal cases, including *GlaxoSmithKline*, *GE Capital*, and *Xilinx*
- ✓ Learn best practices in preparing your transfer pricing documentation
- ✓ Discover effective strategies for tax-efficient supply-chain management
- ✓ Hear case studies on cross-border transactions between customs and transfer pricing
- ✓ Find out about hot audit issues and effective audit-management strategies
- ✓ Hear practical discussion of economic analysis in a challenging economic environment
- ✓ Understand specific industry challenges in transfer pricing through a panel discussion
- ✓ Hear discussion of new services regulations, uncertain tax positions, financial transactions, and IP migration

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KEY ISSUES IN GLOBAL TRANSFER PRICING

September 28 and 29, 2010 • Workshop: September 30, 2010 • Chicago, IL

DAY ONE PROGRAM AGENDA: TUESDAY, SEPTEMBER 28, 2010

8:00 – 8:30 Registration and Continental Breakfast

8:30 – 8:40

Welcome and Opening Remarks from the Chair

Russell Young, Partner, Mayer Brown LLP

8:40 – 9:40

Recent Updates and Developments in North American Transfer Pricing

Merv Edwards, Managing Director, Ceteris

Michelle Johnson, Director, Ceteris

- Recent transfer pricing cases
- Transfer pricing implications of the fifth protocol of the Canada-U.S. Income Tax Convention
- Impacts of the new U.S. services regulations
- Transfer pricing audit trends
- Disclosure of uncertain tax positions

9:40 – 10:40

Complying with New Services Regulations: IRS Perspective and Planning Opportunities

Paul Blankfeld, Senior Manager, International Tax Services, Ernst & Young LLP

- Discussion of new services regulations
- How the new regulations affect you
- Discussion of high-value blackout services
- Real-life examples and case studies
- Potential tax benefits and planning opportunities

Paul Blankfeld has over thirty years of transfer pricing experience. He most recently served as a Senior International Examiner at the IRS.

10:40 – 11:00

Networking Break



11:00 – 12:00

Transfer Pricing Updates and Challenges in Asia

Stanley Sherwood, International Tax Counsel, Gucci Group

- Documentation in Asia: is it any different?
- Negotiating APAs with Asia-Pacific countries
- Finding comparables when there are none
- Use of secret comparables
- MAP cases
- Examples of the history of audits

Stanley Sherwood is an attorney and a former International Tax Partner at PricewaterhouseCoopers in New York. He is independently rated in Euromoney's Expert Guides as one of the world's leading tax and transfer pricing advisors.

SPONSORSHIP AND EXHIBITION OPPORTUNITIES

If you would like to increase your visibility with senior managers in taxation and finance, you need to be at *Global Transfer Pricing*. A limited number of sponsorship options are available: exhibit space, cocktail reception, luncheon, breakfast, and documentation. For more information, contact our sponsorship department at 1.800.474.4829, ext. 244, or email sponsorship@infonex.ca.

12:00 – 1:00

Luncheon

1:00 – 1:50

Understanding IP Migration: Supply-Chain Transfer Pricing

Russ O'Haver, Partner, Ernst & Young LLP

- Transfer pricing tax planning
- Overview of IP migration
- Cost sharing and the PCT valuation
- Supply chain: conversion costs and the OECD draft
- Recent IRS controversy experience

Russ O'Haver is a regular speaker and writer on the topic of transfer pricing. He is consistently selected as a leading advisor in the field of transfer pricing by International Tax Review.

1:50 – 2:50

Discussion of Economic Analysis in a Challenging Economic Environment

Theodor van Stephoudt, Principal Economist, DLA Piper LLP (U.S.)

- Overview of economic analysis
- Issues created by a challenging economic environment
- Arguments of the tax authorities
- Recent experiences
- Summary, conclusion, and lessons learned

2:50 – 3:10

Networking Break



3:10 – 4:00

New Techniques in Transfer Pricing

Stephen Curtis, Senior Manager, Economist, Ernst & Young LLP

- Discussion of dynamic royalties
- Understanding risk adjustments
- Discussion of loans and guarantee fees
- How to use analytical tools
- Effective strategies in transfer pricing

4:00 – 5:00

Understanding Financial Transactions

Brad Rolph, Vice-President, Charles River Associates

Anna Lam, Senior Associate, Charles River Associates

- Overview of financial markets and introduction to intercompany financial transactions
- Hot topics:
 - intercompany loans: implications of the financial crisis
 - the *GE Capital* case: the impact of implicit support on intercompany debt and guarantees
 - captive insurance companies: form versus substance
 - hedging: volatile times require practical solutions
- Activity in the tax courts

5:00

End of Day One

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KEY ISSUES IN GLOBAL TRANSFER PRICING

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DAY TWO PROGRAM AGENDA: WEDNESDAY, SEPTEMBER 29, 2010

8:00 – 8:30

Continental Breakfast

8:30 – 8:40

Opening Remarks from the Chair

Russell Young, Partner, Mayer Brown

8:40 – 9:30

Discussion of Uncertain Tax Positions

Dale Hill, Partner, Gowling Lafleur Henderson LLP

- Current contentious issues
- Dispute resolution mechanisms to mitigate risk of double taxation
- Different avenues for dispute resolution, including APAs: not all avenues are the same
- Disputes eligible for mandatory arbitration
- Rules regarding the arbitration procedure, and the major impact that mandatory arbitration provisions will have on the resolution of double taxation cases

9:30 – 10:20

How to Prepare Effective Documentation

Deloris Wright, President, Wright Economics Inc.

- Approaches to documentation
- Functional analysis: making it useful
- Industry analysis: what is its purpose? How do you do it?
- Economic analysis: approaches to comparables searches
- Intercompany agreements and other types of documentation

Deloris Wright spent four years as an economist with the IRS, where she gained substantial knowledge and experience related to intercompany pricing audits.

10:20 – 10:40

Networking Break



10:40 – 11:40

Hot Audit Issues for Today and Tomorrow: Key Insights on Effective Strategies

Andrew Sliwa, Managing Director, Ceteris
Christopher Desmond, Managing Director, Ceteris

- Current issues from a financial audit perspective
- Current issues from an IRS audit perspective
- Financial audits: effective strategies for dealing with your auditor
- Tax audits: building your best transfer pricing position for the IRS and other taxing authorities
- Procedural strategies and considerations

11:40 – 12:30

Supply-Chain Management Issues

Kathrine Kimball, Vice-President, Charles River Associates

- Overview of and issues with traditional supply-chain models
- Integrating tax planning and key tax issues into supply-chain management
- Impact of the OECD discussion draft on business restructuring

12:30 – 1:30

Luncheon

1:30 – 3:00

PANEL DISCUSSION

Specific Industry Challenges in Transfer Pricing and Best Practices for Dealing with Them

Harry Keates, Vice-President, Wright Economics, Inc.
Barry Agranoff, International Tax Manager, Pearson Inc.
Kelly Russell Turner, Senior Director, Transfer Pricing, Electronic Arts Inc.
Joshua Wookey, Director, Transfer Pricing, Oracle

Listen to corporate tax professionals dispense advice, share predictions, and discuss the transfer pricing function at their companies.

- Industry experts discuss specific transfer pricing challenges at their companies
- Discussion of unique aspects and real-world applications of transfer pricing
- Practical discussion of different approaches to transfer pricing
- Predictions for the future of transfer pricing

3:00 – 3:20

Networking Break



3:20 – 4:10

Transfer Pricing and Customs Valuation: What You Need to Know (What You Don't Know Can Hurt You)

Damon Pike, President, The Pike Law Firm, P.C.
Dalton Albrecht, Partner, International Trade Law and Commodity Tax, Miller Thomson LLP

- What is customs transfer pricing?
- Why is it different from income tax and transfer pricing? What are the similarities?
- New issues and developments: recent rulings, compensating adjustments, management fees, and subsequent proceeds
- Canada-U.S. comparative trends
- Penalties
- Enforcement priorities
- Real-life case study

4:10 – 5:00

Practical Lessons Learned from Transfer Pricing Legal Cases

Marc Levey, Partner, Baker & McKenzie LLP

- *GlaxoSmithKline* and *DHL*: the world of marketing intangibles and what it means to you
- *Xilinx* and *Veritas*: what is happening with cost sharing?
- *Container Corporation of Canada* and guarantee fees
- *Zimmer SAS* and commissionaires

5:00

End of Day Two

PLUS! Take advantage of our  optional post-conference workshop

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KEY ISSUES IN GLOBAL TRANSFER PRICING

September 28 and 29, 2010 • Workshop: September 30, 2010 • Chicago, IL

OPTIONAL WORKSHOP: THURSDAY, SEPTEMBER 30, 2010

HALF-DAY WORKSHOP: 9:00 – 12:00

Canada-U.S. Side of Transfer Pricing

Jamal Hejazi, Chief Economist, Gowling Lafleur Henderson LLP

This workshop will cover all aspects of transfer pricing and any other possible tax issues arising between Canada and the U.S. It will discuss the latest updates and developments at the CRA and IRS.

- Current state of affairs between the CRA and IRS
- Advance Pricing Agreement (APA): new trends and problem areas
- Updates on arbitration and mediation between Canada and the U.S.
- Other accounting issues between Canada and the U.S.
- Secret comparables

Prior to joining Gowlings, Jamal Hejazi was a senior transfer pricing economist with the Canada Revenue Agency, where he participated in the resolution of a number of transfer pricing issues, including the relief of double taxation on Canadian corporations. He was instrumental in the negotiation of advanced pricing agreements between Canada and foreign tax authorities.

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— Analyst, Taxation, GE CAPITAL

“ The seminar was very useful to get an update on recent trends in the field. ”

— Economist, Transfer Pricing, SIEMENS CANADA

“ Would definitely recommend to others! ”

— Financial Accountant, ENERGIZER INC.



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CPE CREDIT DETAILS:

Prerequisites: None
Program Level: Update

Advance preparation: None
Instruction Method: Live/Group

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Key Issues in Global Transfer Pricing

September 28–29, 2010 · Workshop: September 30, 2010
CHICAGO, ILLINOIS

THREE KEY BENEFITS OF ATTENDING THIS EVENT

- 1) Hear case studies of effective transfer pricing practices in several U.S. companies
- 2) Compare current challenges faced by other organizations with your own
- 3) Get expert advice on developing effective and strategic audit management practices

LOCATION: *Key Issues In Global Transfer Pricing* will be held at a convenient location in Chicago, Illinois. Detailed venue information will be provided with your registration confirmation.

YOUR REGISTRATION INCLUDES: Registration fees include all course materials, continental breakfast, lunch, and refreshments. **Parking and accommodation are not included.**

SPONSORSHIP & EXHIBITION

Increase your visibility with senior managers in taxation and finance, you need to be at *Key Issues in Global Transfer Pricing*. A limited number of sponsorship options are available. For more information, call 1.800.474.4829, ext. 244, or email sponsorship@infonex.ca.

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CANCELLATION POLICY:

Substitutions may be made at any time. If you are unable to attend, please make cancellations in writing and fax to 1-800-558-6520 **no later than September 14, 2010**. A credit voucher will be issued to you for the full amount, redeemable against any other INFONEX course and which is valid for twelve months (one year) from the date of issue. If you prefer, you may request a refund of fees paid, less a 15% administration fee.

Registrants who cancel after **September 14, 2010**, will not be eligible to receive any credits or refunds and are liable for the entire registration fee.

Confirmed registrants who do not cancel **by September 14, 2010** and fail to attend will be liable for the entire registration fee.