

Session 4 Programme

Title:	Transfer Pricing in Ireland in 2020 and Beyond
Tutors:	Conor O'Sullivan and Noel Maher, <i>KPMG</i>
Date:	tbc 2020
Venue:	Online

Topic	Tutor
<p>Transfer Pricing “Back to Basics”</p> <ul style="list-style-type: none"> Recap on the key Transfer Pricing (TP) terminology and concepts Overview of the 2017 OECD TP guidelines 	Conor O’Sullivan and Noel Maher, <i>KPMG</i>
<p>Transfer Pricing Finance Act 2019 measures</p> <ul style="list-style-type: none"> Examine the 2019 changes to Irish legislation Assess the impact of the measures utilising case studies and examples Understand the types of structure impacted by recent changes Understand how Ireland’s TP regime compares to other jurisdictions 	
<p>Transfer Pricing Finance Act 2019 measures cont’d</p>	
<p>Tax Controversy and Dispute Resolution in the context of Transfer Pricing</p> <ul style="list-style-type: none"> Role of Advance Pricing Agreements (APA) Managing a TP dispute Understand when Mutual Agreement Procedures (MAP) might be enacted from a TP perspective 	Conor O’Sullivan and Noel Maher, <i>KPMG</i>

This programme covers topics from the ADIT Module 3.03: Transfer Pricing Option