

Transfer Pricing for the Corporate Sector

Speaker: Michael Douglas & Kevin Ryan, *PwC*
Date: Tuesday 13 December 2022 - 08.30 – 10.30
Venue: Hybrid – via Zoom & in ITI

Programme:

| Time | Topic | Speakers |
|-------------|---|-----------------------------|
| 08.30-08.35 | Introduction & Opening Remarks | |
| 08.35-09.20 | Part 1 – Recap of Irish Transfer Pricing rules <ul style="list-style-type: none">• Summary of Irish transfer pricing rules• Topical areas in the Irish transfer pricing landscape• Common scenarios and issues that can arise from the application of transfer pricing principles• Approaches to TP Documentation• Looking to the future, what's next for Transfer Pricing in Ireland? | Michael Douglas, <i>PwC</i> |
| 09.20-09.30 | Break | |
| 09.30-10.15 | Part 2 – Transfer Pricing Disputes and Resolution mechanisms <ul style="list-style-type: none">• Irish Transfer Pricing Audits• Overseas Transfer Pricing Audits - when and how to use the following:<ul style="list-style-type: none">○ Mutual Agreement Procedure (MAP)○ Advance Pricing Agreement (APA)○ Correlative adjustments | Kevin Ryan, <i>PwC</i> |
| 10.15-10.30 | Part 3 - Q&A | |

Speakers

Michael Douglas

Overview

Michael is a Senior Manager in the Transfer Pricing Team in PwC Dublin. He joined the Dublin office in 2014 and has over eight years' experience in assisting multinational companies in the field of transfer pricing across multiple sectors.

Experience

Michael gained experience in a wide variety of transfer pricing projects through the years, across several industries. Projects include business planning, documentation, pricing/benchmarking, tax dispute resolution, advance pricing agreements and other related consulting work. Michael has a

focus on the financial services industry and some of the projects he has participated in this industry included pricing of financing arrangements, cash pools and guarantees across various industries

Education and certifications

Michael is a member of the Institute of Chartered Accountants in Ireland and a member of the Irish Taxation Institute. Michael has a BSc in Economics and Finance from University College Dublin.

Kevin Ryan

Overview

Kevin is a Senior Manager in the Transfer Pricing Team in PwC Dublin. He joined the Dublin office in 2012 and has over ten years' experience in assisting multinational companies in the field of transfer pricing across multiple sectors.

Experience

Kevin has experience assisting clients who operate across a broad range of industries with transfer pricing matters, including cross-border planning, controversy and dispute resolution, and documentation and compliance.

Kevin is part of the firm's Tax Risk and Controversy team, assisting clients on Irish Revenue transfer pricing audits, bilateral APAs, MAP, and correlative relief claims.

He previously completed a two year international secondment to PwC Melbourne where he worked as part of the Global Tax team, assisting clients to manage local transfer pricing documentation requirements.

Education and certifications

Kevin is a Member of the Institute of Chartered Accountants in Ireland and a Member of the Irish Taxation Institute.