

TAX531 Applying Transfer Pricing

Level: 5

Credit Units: 5 Credit Units

Language: ENGLISH

Presentation Pattern: EVERY JAN

Synopsis:

TAX531 Applying Transfer Pricing builds on TAX525 Transfer Pricing, which provided the student with the opportunity to explore the challenges of the OECD Transfer Pricing Guidelines for Multinational and Tax Administrators. A Transfer Pricing Report is the usually the basis upon which a multinational's transfer pricing policy is defended, and is also the main document submitted to the tax authority for their scrutiny. The Report is therefore a vital piece of documentation that can either be prepared from as a compliance requirement, an aggressive planning tool, or as a defensive document. In any case, understanding of the application of the rules covered in TAX525 is key to this course, as students are taken through the application of the principles through case studies and exercises.

At the end of this course, students will have the skills to prepare a transfer pricing report complying with OECD Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations and will also be able to critique a report, evaluating whether or not a report is acceptable under those guidelines.

Topics:

- Review of the Core Principles of Transfer Pricing
- Evidence for Tax Purposes
- Transfer Pricing Documentation
- The Content of the Transfer Pricing Report

Textbooks:

TY Sim: Singapore Transfer pricing Masterguide (2018), Wolters Kluwer.
ISBN-13: 9789814446891

Learning Outcome:

- Evaluate OECD and Singapore Transfer Pricing Guidelines
- Construct arguments using the transfer pricing principles covered
- Apply the transfer pricing principles to realistic fact situation(s), computing where required an arm's length range
- Critique and defend position(s) taken in transfer pricing applying the arm's length principle
- Prepare an outline transfer pricing report, fact pattern or case analysis, identifying gaps and write-up that would need to be filled to complete the report
- Appraise relevant legislation, tax authority guidance and cases identifying short-comings, and suggesting possible improvements
- Assemble paper or web resources to conduct research
- Examine and analyse legal materials which are written in technical or complex language
- Compose and present data provided in numerical or statistical form
- Discuss through different forms of communication, such as verbal, written and formal presentations, presenting knowledge or an argument in a way which is comprehensible to others

Assessment Strategies (Evening Class):

Components	Description	Weightage Allocation (%)
Overall Continuous Assessment	TUTOR-MARKED ASSIGNMENT 1	40
Overall Examinable Components	ECA	60
Total		100