



Deloitte School of Tax & Legal Transfer Pricing - Navigating the New Compliance Requirements

We have the pleasure of inviting you to our **Transfer Pricing Workshop** aimed at assisting your business to navigate the new compliance requirements. Transfer pricing has become an important focus area for SARS and revenue authorities around the world in line with the new developments in BEPS.

The workshop will cover the latest developments in the transfer pricing landscape in South Africa ("SA") and the African region. Particular focus will be on the aspects of wider compliance and complex transfer pricing issues impacting your business.

The session will provide insight into key transfer pricing focus areas, such as financial assistance, intellectual property ("IP"), limited risk models and model restructurings.

An additional focus point will be transfer pricing dispute resolution and recent developments in this area.

The agenda for the workshop is as follows:

Topic	Content	Timing
Registration		8:00a.m. – 8:30a.m.
Latest developments in SA	<p>This session will look at how the latest global transfer pricing developments affect SA companies. In particular we will cover:</p> <ul style="list-style-type: none"> Country-by-Country reporting for SA Headquartered companies and subsidiaries of Multinational companies in SA Master file Local file 	8:30a.m. – 09:15a.m.
TP and other tax areas	<p>The purpose of this session is to look at the impact TP has on other tax areas, for example:</p> <ul style="list-style-type: none"> Customs duty VAT Corporate income tax Share schemes 	9:15a.m. – 10:00a.m.
Other developments across Africa	<p>This session will explore the recent TP related developments across the African continent and will include:</p> <ul style="list-style-type: none"> New legislative changes Dispute resolution <p>Other challenges currently being faced by multinationals</p>	10:00a.m. – 10:30a.m.
Tea – 15 Minutes		
Key Transfer Pricing focus areas post BEPS	<p>The key transfer pricing areas are directed at potential risk areas for businesses based on current trends. These would include:</p> <ul style="list-style-type: none"> Financial Assistance Intellectual property Limited risk models Restructurings/change in TP models 	10:45a.m. – 11:45p.m.
Dispute resolution	<p>Dispute Resolution will look specifically at TP dispute resolution. The session will look to provide insight recent transfer pricing court cases and will include a discussion around the outcomes and relevance of these cases to South Africa.</p>	11:45p.m. – 12:25p.m.
Wrap-up & Questions		

Facilitators:

Billy Joubert (Johannesburg & Cape Town)

Billy is the head of the transfer pricing team at Deloitte. Billy is an attorney and has been involved in the preparation of transfer pricing opinions and policy design for South African and African-based multinational clients in a wide variety of industries, including mining, banking, telecommunications, packaging, and freight and logistics. He regularly provides advice on the implications for South African subsidiaries of foreign global transfer-pricing studies, including adapting these to meet in-country compliance requirements.

Cabrini McCarrick (Johannesburg & Durban)

Cabrini is an Associate Director in the Deloitte Transfer Pricing Tax team. Cabrini is an economist, chartered accountant and lawyer with a broad client portfolio and extensive experience across a variety of industries, including energy and resources, mining, financial services, consumer business, and FMCG sectors.

Steven Breslin (Johannesburg)

Steven is an Associate Director in the Deloitte Transfer Pricing Tax team. Steven is a Chartered Accountant and a member of the South African Institute of Chartered Accountants. He also has a Higher Diploma in Tax Law, MCom in International Tax and specialised in transfer pricing. Steven is a benchmarking and financial assistance specialist and has serviced in a number of industries with key focus on the mining sector.

Dates and Venues:

Johannesburg	17 April 2018
Cape Town	20 April 2018
Durban	24 April 2018

Cost:

R1 707.75 (inclusive of VAT)/R1 485 (exclusive of VAT)

Payment is due after the seminar date.

Company Discount: 10% for 2 or more participants from the same company and region. The discount applies from participant 2 onwards.

Alumni Discount: 10% for Deloitte alumni. This applies if you are a former employee of Deloitte and have registered as Deloitte alumni. ([Click here](#) to register as an alumnus)
You will only qualify for one of the 10% discounts

Cancellation Policy:

Our standard cancellation policy is to invoice 50% of the cost of the workshop for attendance not cancelled within 2 business days of the planned session date. This is to recover the overhead costs incurred relating to your planned attendance and the cost of the course material.

Time:

8:30 a.m. – 12:30 p.m. (Registration from 8:00)

The course will contribute to **4 hours** CPD/CPE

RSVP:

Please note that we use an online booking system. Kindly complete the online booking form using the link below.

The link will open the booking page of the Deloitte School of Tax & Legal but it will not select the course or region for you. Please be sure to select the correct course, date and region from the drop-down menu.

You will be able to register several people using one form. (Please contact us at dsot@deloitte.co.za if you wish to make bookings for more than 20 people at once.)

[Register Here](#)

Course Material:

In the interests of the environment, and to move with technology, this will be a paperless course. We will email you the course material within 2 business days of the planned session date. You will then have the option to bring the course material on your laptop/tablet, or should you prefer, to print the material. We will have plug points in the venues for laptops/tablets

Contact us:

Should you have any administrative questions regarding this workshop, please contact us at dsot@deloitte.co.za

[Deloitte School of Tax & Legal Website](#)

Sincerely,

The Deloitte School of Tax & Legal Team



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