



**Training Programme on “Audit of Transfer Pricing”
(13.04.2015 to 17.04.2015)**



Day	Session I (1000 to 1115 hours)		Session II (1145 to 1300 hours)	Session III (1400 to 1515 hours)	Session IV (1545 to 1700 hours)
13.04.2015 Monday	Inauguration at 10.00 am (DAI-CRA) & Government perspective on Transfer Pricing		Global Transfer Pricing- An Overview of OECD Guidelines	Importance of FAR Analysis and Documentation of Functional Analysis/Documentation (Compliance) Requirements for Transfer Pricing (Rule 10D of Income Tax Rules)	Overview of TP regulations
	Shri S. M Nigam, Member (I.T) CBDT		Shri Ganapati Bhat- [CIT(TP-I & II), ND]	Shri Ashish Heliwal Addl CIT (TP), Mumbai	Shri G.C. Srivastava, DG (Int. Tax) (Retired)
14.04.2015 Tuesday	Public Holiday				
15.04.2015 Wednesday	(9 am to 10 am) Audit of Transfer Pricing Case study (Mumbai Office)	(10 am to 11.15 am) Transfer Pricing Procedure including structure of TP Directorate and Role of Transfer Pricing officer	Transfer Pricing Concepts-Inter Company Transfers	Transfer Pricing of Intangibles	Transfer Pricing Penalties
	Shri Shailesh Jakotiya, Director	Shri Bhaskar Goswami-Addl. [CIT(TPO-1(3), ND]	Shri Anurag Sharma- [JCIT(TPO-3(1), ND]	Ms. Kavita Pandey- CIT(TP)-3, ND & Rahul Garg, Adl. CIT, TPO-1(1), ND	Ms. Kavita Pandey [CIT(TP)-3, ND] & Rahul Garg, Adl. CIT, TPO-1(1), ND
16.04.2015 Thursday	(9 am to 10 am) Audit Checks to be exercised in TP Audit (Mumbai Office)	(10 am to 11.15 am) Methods of Computation of Arms Length Price	Most Appropriate Method of Computation of ALP	Emergence of Specified domestic transactions (SDT)	New challenges before the TPOs
	Shri Shailesh Jakotiya, Director	Shri Subhakant Sahu-Addl. [CIT(TPO-1(2), ND]	Shri Jasdeep Singh- [Addl. CIT(TPO-2(2), ND]	Shri Vijay Choudhary, JCIT-TPO-2(1), ND	Ms. Malathi R. Sreedharan- CIT, TP-(1), Mumbai

17.04.2015 Friday	(1000 to 1115 hours) Important case laws	Safe Harbour Rules and Advance Pricing Agreement	Transfer Pricing Assessment- Case Studies	Transfer Pricing Assessment- Case Studies
	Shri Bhaskar Goswami- Addl. CIT- TPO-1(3), ND & Anshuman Sharma- JCIT(TPO-3(3), ND)	Shri Kamlesh C. Varshney- CIT(APA)-1, ND	All officers under co- ordination of Shri Rahul Garg [Addl.CIT-TP-1(1)]	All officers under co- ordination of Shri Anurag Sharma – JCIT, TPO-3(1)

Tea Break: 1115 to 1130 hours

Lunch Break: 1300 to 1400 hours

Coffee Break: 1515 to 1530 hours