

# LAWS70203 Transfer Pricing: Practice and Problems

<b>Credit Points:</b>	12.50
<b>Level:</b>	7 (Graduate/Postgraduate)
<b>Dates &amp; Locations:</b>	2011, Parkville This subject commences in the following study period/s: June, Parkville - Taught on campus.
<b>Time Commitment:</b>	Contact Hours: The total class time is between 24 and 26 hours. Total Time Commitment: Not available
<b>Prerequisites:</b>	Visit the Melbourne Law Masters website for more information about this subject.
<b>Corequisites:</b>	Visit the Melbourne Law Masters website for more information about this subject.
<b>Recommended Background Knowledge:</b>	Visit the Melbourne Law Masters website for more information about this subject.
<b>Non Allowed Subjects:</b>	Visit the Melbourne Law Masters website for more information about this subject.
<b>Core Participation Requirements:</b>	Visit the Melbourne Law Masters website for more information about this subject.
<b>Coordinator:</b>	Assoc Prof Michael Kobetsky
<b>Contact:</b>	For more information, contact the Melbourne Law Masters office. Email <a href="mailto:law-masters@unimelb.edu.au">law-masters@unimelb.edu.au</a> ( <a href="mailto:law-masters@unimelb.edu.au">mailto:law-masters@unimelb.edu.au</a> ) or phone +61 3 8344 6190. Alternatively, visit our website: <a href="http://www.masters.law.unimelb.edu.au">www.masters.law.unimelb.edu.au</a> ( <a href="http://www.masters.law.unimelb.edu.au/">http://www.masters.law.unimelb.edu.au/</a> )
<b>Subject Overview:</b>	Principal topics will include: <ul style="list-style-type: none"> <li># Legal framework around transfer pricing</li> <li># OECD guidelines on transfer pricing</li> <li># Australia's tax legislation and tax rulings on transfer pricing</li> <li># Australia's tax treaties and transfer pricing</li> <li># Case law in Australia and overseas</li> <li># Transfer pricing methodologies – selection and application for the following transactions: <ul style="list-style-type: none"> <li># Tangible goods</li> <li># Intangibles</li> <li># Services</li> <li># Financing transactions</li> </ul> </li> <li># Transfer pricing documentation requirements</li> <li># Performing a comparable search (benchmarking)</li> <li># Completing the transfer pricing section of the tax return (Schedule 25A)</li> <li># Transfer pricing controversy</li> <li># Risk reviews and audit approach</li> <li># Advance pricing arrangements.</li> </ul>
<b>Objectives:</b>	This subject provides an introduction to the Organisation for Economic Co-operation and Development (OECD) Transfer Pricing Guidelines, Australian transfer pricing rules and practical case studies.  International transfer pricing is the price charged for the transfer of property or services between associated entities in an international company group. Transfer pricing is consistently identified in international surveys of multinational enterprises as the most important tax issue they face.

	<p>Multinational enterprises have to deal with demands from the various jurisdictions in which they operate as national tax agencies implement measures to protect their revenue from cross-border trade between associated entities. Multinational enterprises often incur significant costs in complying with domestic tax rules.</p> <p>This subject is designed for both transfer pricing advisers and tax advisers.</p>
<b>Assessment:</b>	Visit the Melbourne Law Masters website for more information about this subject.
<b>Prescribed Texts:</b>	Core subject materials will be provided free of charge to all students. Some subjects require further texts to be purchased. Visit the Melbourne Law Masters website for more information about this subject.
<b>Breadth Options:</b>	This subject is not available as a breadth subject.
<b>Fees Information:</b>	Subject EFTSL, Level, Discipline & Census Date, <a href="http://enrolment.unimelb.edu.au/fees">http://enrolment.unimelb.edu.au/fees</a>