

## LAWS70203 Transfer Pricing: Practice and Problems

<b>Credit Points:</b>	12.50
<b>Level:</b>	7 (Graduate/Postgraduate)
<b>Dates &amp; Locations:</b>	2012, Parkville This subject commences in the following study period/s: September, 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>	None.
<b>Corequisites:</b>	None.
<b>Recommended Background Knowledge:</b>	Applicants without legal qualifications should note that subjects are offered in the discipline of law at an advanced graduate level. While every effort will be made to meet the needs of students trained in other fields, concessions will not be made in the general level of instruction or assessment. Most subjects assume the knowledge usually acquired in a degree in law (LLB, JD or equivalent). Applicants should note that admission to some subjects in the Melbourne Law Masters will be dependent upon the individual applicant's educational background and professional experience.
<b>Non Allowed Subjects:</b>	None.
<b>Core Participation Requirements:</b>	The Melbourne Law Masters welcomes applications from students with disabilities. The inherent academic requirements for study in the Melbourne Law Masters are: The ability to attend a minimum of 75% of classes and actively engage in the analysis of complex materials and debate; The ability to read, analyse and comprehend complex written legal materials and complex interdisciplinary materials; The ability to clearly and independently communicate in writing a knowledge and application of legal principles and interdisciplinary materials and critically evaluate these; The ability to clearly and independently communicate orally a knowledge and application of legal principles and interdisciplinary materials and critically evaluate these; The ability to work independently and as a part of a group; The ability to present orally and in writing legal analysis to a professional standard. Students who feel their disability will inhibit them from meeting these inherent academic requirements are encouraged to contact the Disability Liaison Unit: <a href="http://www.services.unimelb.edu.au/disability/">www.services.unimelb.edu.au/disability/</a>
<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.law.unimelb.edu.au/masters">www.law.unimelb.edu.au/masters</a> ( <a href="http://www.law.unimelb.edu.au/masters">http://www.law.unimelb.edu.au/masters</a> )
<b>Subject Overview:</b>	Transfer pricing is the most important tax issue that multinational businesses face, as they deal with demands from the countries in which they operate, and as national tax authorities implement measures to protect their revenue from cross-border trade between associated enterprises. A transfer price is the price charged for the transfer of property or services between associated enterprises in a multinational company group. This subject studies the OECD (Organisation for Economic Co-operation and Development) Transfer Pricing Guidelines, and the Australian transfer pricing and their application. It is taught by highly experienced academics and practitioners, who consult regularly to international institutions, governments and business about these international tax rules. This subject is designed for tax advisors, in-house tax managers, government officials as well as those practising in transfer pricing. A background in transfer pricing is not required. 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</li> <li># Transfer pricing methodologies – selection and application for the following transactions in respect of tangible goods, intangibles, services and financial transactions</li> <li># Transfer pricing documentation requirements</li> <li># Performing a comparable search (benchmarking)</li> <li># Completing the transfer pricing section of the tax return</li> <li># Risk reviews and audit approach.</li> </ul>
<b>Objectives:</b>	<p>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.</p> <p>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. 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>	Class participation (10%) Take-home examination (90%) (6,000 words) (12 pm 26 October to 5 pm 29 October)
<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>
<b>Links to further information:</b>	<a href="http://www.law.unimelb.edu.au/masters/courses-and-subjects/subject-details/sid/5266">http://www.law.unimelb.edu.au/masters/courses-and-subjects/subject-details/sid/5266</a>