



UNIVERSITY OF AMSTERDAM
Amsterdam Centre for Tax Law



Executive Course

Transfer Pricing Business Simulation





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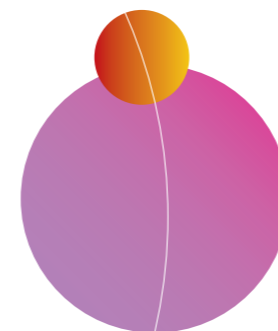
Transfer Pricing Business Simulation

This course is built on a business simulation case study that aims to provoke a developmental shift from knowing the law to critical thinking in transfer pricing cases, which is required for success in law and business practice.

A business simulation approach means that the course participants will receive one comprehensive case study that will be dealt with during the whole period of the course – 4,5 days – from every perspective of transfer pricing, for example, financial transactions, business restructurings, allocation of profits from intangibles assets, etc.

International taxation and transfer pricing is a comprehensive field, where actual clients' and taxpayers' matters always concern a multitude of interlinked legal issues. The transfer pricing practice dictates the demand for tax experts being able to understand the impact of specific transfer pricing policies on the overall strategic transfer pricing policy of a multinational group and event broader – on all the important tax positions of the enterprise, for example, from a tax treaty or EU law tax perspectives.

In addition, since transfer pricing is not a precise science, where decisions should often be based on assumptions, the business simulation approach aims at discussing the course case from alternative viewpoints on the best solution to develop the thinking skills necessary for making, supervising or reviewing a coherent and complete business decision. For this purpose, a representative from the tax administration and from a multinational enterprise will take part in the business simulation game.



Topics

- **The arm's length principle**
- **Transfer pricing methods**
- **Comparability analysis**
- **Risk allocation and risk adjusted pricing**
- **Transfer pricing aspects of transaction involving intangibles**
- **Transfer pricing aspects of intra-group services**
- **Transfer pricing aspects of business restructurings**
- **Transfer pricing aspects of financial transactions**

The business case simulation approach means that no precise schedule or time slot will be dedicated to one topic. Instead, the course participants will experience how one issue always triggers the next transfer pricing issue, which build together a single transfer pricing strategy. The case study is designed on the real case and therefore is as close as possible to the realistic scenarios rather than dry theory. During the course, participants will have meetings with representatives from the industry as well as from tax authorities, where they can experience how in real life the transfer pricing decisions are made and how transfer pricing issues are being discussed with authorities. You can expect thought-provoking discussions about transfer pricing challenges, defending different positions and making decisions based on critical assumptions, complex interactions and group engagement. Participants should realize that this course is very intensive and little free time is available, even in the evenings, where participants are requested to prepare homework for the next day.



Key concepts

- Develop a fundamental understanding of transfer pricing, rationale, requirements and policies
- Take a helicopter view on the links between transfer pricing and other areas of international taxation
- Prepare yourself for commercial and strategic thinking in international tax
- Immerse yourself into a game environment to stimulate critical thinking and taking a sound stand in every problem that does not have a high degree of legal certainty
- Early-Career Transfer Pricing Professionals
- Tax professionals who would like to learn transfer pricing
- In-house tax specialists responsible for the design of group tax policies
- Specialists from the Tax authorities responsible for group tax audits
- Academics in the transfer pricing field

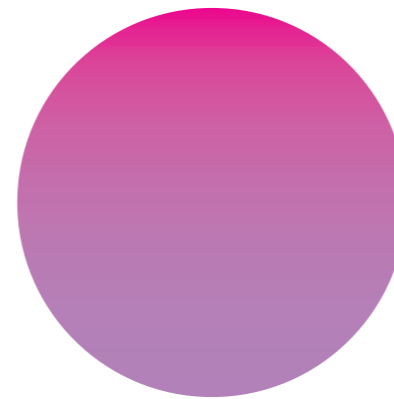
Who will benefit



“Case studies are always the most favorite and also the most useful part in the learning experience – the connection from textbook to reality will definitely make the course practically valuable, memorable, enjoyable and interesting for you.”

Prof. Dennis Weber, Director of the Amsterdam Centre of Tax Law of the University of Amsterdam

Facts



- Dates** **11 – 15 September 2023**
- Monday – Thursday (11-14 September), from 9:00 till 16:30, including a 1,5 hours lunch break and two additional 30 min breaks.
 - Friday (15 September), from 9:00 till 12:30, including a 30 mins break.

Instructors Rutger Hafkenscheid
Svitlana Buriak
Steffanie van der Kroon

Representative of the tax authority **Aarnout Hamelink**
Specialist Corporate Income Taxes & Transfer Pricing Dutch Tax Authorities

Representative of an MNE **Önder Albayrak**
Head of Transfer Pricing – Head of Tax Benelux, Corporate Tax – Tax Strategy & Operations of Sanofi

- What will you receive** **Degree**
- ACTL certificate of attendance (50% minimum class attendance). The course qualifies for 28 PE hours for the NOB Permanente Educatie
 - But most importantly – highly-valuable knowledge and experience.

- Social activities**
- 1. Excursion in the Allard Pierson Museum**
The Allard Pierson Museum in Amsterdam offers a captivating social activity. This ancient civilizations museum houses a remarkable collection of artifacts and artworks.
 - 2. Boat tour**
A boat tour in Amsterdam immerses participants in the vibrant atmosphere of the city's canals.
 - 3. Dinner**
As everyone gathers around the table, stories are shared, ideas are exchanged, and friendships are forged, creating a warm and inclusive atmosphere that enhances the overall learning experience.

Location Allard Pierson Museum
Oude Turfmarkt 127-129
1012 GC Amsterdam



Nestled in the heart of Amsterdam, the Allard Pierson Museum is housed in a magnificent historical building that dates back to the late 19th century. As the archaeological museum of the University of Amsterdam, it boasts a rich collection of artifacts from various ancient civilizations, including Egypt, Greece, and Rome. This setting provides a stimulating and inspiring backdrop for your course, fostering an atmosphere of curiosity and intellectual exploration. This combination of intellectual engagement and cultural immersion is sure to leave a lasting impression.

Price € 3.400,-
€ 2.900,- (early bird discount)

Deadline Early bird admission: 15 July 2023
Final admission: 15 August 2023

How to apply Fill in the registration form on www.aanmelder.nl/tpcourse/subscribe

Disclaimer: Please note that the course mentioned will only take place if a minimum of 10 participants are registered. Additionally, the course reserves the right to cancel the event up to one month in advance, if necessary. Participants will be duly informed in such a scenario.



Lecturers

Rutger Hafkenscheid



Rutger Hafkenscheid is a Partner at Huygens Quantitative Consulting (Amsterdam). Rutger serves a wide range of clients, domestic and international, in real estate, private equity and other industries. He specialises in the quantification of risks and rewards in all aspects of corporate taxation and transfer pricing, from business restructurings to financial transactions, including loan financing, derivatives, and captive insurance. Rutger developed a methodology for the valuation of uncertain tax claims in litigation.

Rutger received his degree in tax law from the Rijksuniversiteit Groningen in 1987. After having served a few years as a counsel to one of the political parties in Dutch Parliament, he started his career as a tax advisor with one of (then) Big Eight accounting firms. In 1995, he continued his career with Arthur Andersen, where he was made partner in 1998. Between 2002 and 2009, Rutger was a tax partner with Deloitte in Amsterdam, where he was Community Head from 2006 to 2008. From 2013 onwards, he worked as a counsel in the transfer pricing and economics practice of Loyens & Loeff.

Rutger lectures transfer pricing as a visiting lecturer at the Universiteit van Amsterdam and frequently publishes about tax and transfer pricing in Dutch and international journals.

Dr. Svitlana Buriak



Svitlana Buriak is an Ass. Professor at the University of Amsterdam and Director of the Amsterdam Center for Transfer Pricing and Income Allocation. She successfully defended her doctoral dissertation in Business Tax Law at the Vienna University of Economics and Business. She is also a tax adviser at Loyens & Loeff (Amsterdam Office). Svitlana specialises in international and European tax law, and transfer pricing.

Svitlana advises clients on matters such as IP structures, business restructurings, intra-group financial transactions, implications of OECD Pillar II, transfer pricing and state aid, etc.

Svitlana is an author of many articles published in peer-reviewed journals and book contributions, as well as an active speaker at academic and professional conferences and events.

Steffanie van der Kroon



Steffanie van der Kroon is a tax adviser at Loyens & Loeff (Amsterdam Office). She advises multinationals on international tax law, with a focus on transfer pricing. Steffanie specialises in Dutch corporate tax issues in international structuring and restructuring. She is further involved in a broad range of transfer pricing related issues, such as the implementation and evaluation of transfer pricing systems, obtaining advance pricing agreements, assisting with business restructurings and value chain analyses as well as the preparation of the required transfer pricing documentation.

Aarnout Hamelink



Aarnout Hamelink was educated as an accountant and tax expert and has broad and deep experience within the Tax Administration in corporate income tax, with a focus on transfer pricing. Positions Aarnout has held include income tax and corporate income tax specialist in the SME segment, corporate income tax specialist and client coordinator with focus area large enterprises, secretary of the Transfer Pricing Coordination Group, content manager of the APA team, negotiator on behalf of the Tax Administration in many Multilateral Agreement Procedures and Bilateral Advance Pricing Agreements and Technical Advisor Corporate Income Tax of a unit in which the construction, trade and industry sectors are represented in the large enterprises segment. Aarnout takes noticeable pleasure in providing professional guidance to individuals and groups and has extensive experience in this too within and outside the Tax Administration.

Önder Albayrak



Önder Albayrak is the Head of Transfer Pricing within the Tax Strategy & Operations team of Sanofi, a global biopharmaceutical company providing healthcare solutions in more than 170 countries. Following his career at a Big4 firm, he moved in 2006 to industry to work at Genzyme a NASDAQ-listed biotechnology company which got acquired in 2011 by a Sanofi where he pursued his career in various regional and global corporate tax and transfer pricing roles. During his twenty+ years of experience in international taxation, he advised and supported corporate, regional and local management, operations, finance and legal teams on international corporate taxation and transfer pricing matters such as intangible assets planning, supply chain and transfer pricing structuring, business expansions and restructurings, post-merger integrations, tax and transfer pricing controversy, negotiations with tax administrations and tax policy matters. Önder Albayrak holds an LL.M. in Dutch and International Tax Law from the University of Utrecht, the Netherlands and appears from time to time as guest speaker and lecturer at conferences and courses.

