“When you come to an institution like Duke, you know that you are getting a state of the art experience because you gain credibility after meeting professionals who have worked in this discipline for years.”

Fernando Cossio, participant
The Program

Transfer pricing is the most challenging issue in international tax today, creating controversy and frustrations for both taxpayers and tax administrators. Within a multinational company, it is routine for one member of the group to sell goods or provide services to another member of the group. In the case of a global supply chain, a single product may be sold and re-sold within a group three, four and even more times. To determine the proper income of each company within the group — and to ensure that each country where the group conducts business receives the right amount of income tax — it is essential to determine the proper prices for these related party transactions. But computing arm’s-length prices is not easy when there are no readily available market prices for the goods or services.

This course will provide tax administrators with insight into the complex world of transfer pricing. This knowledge will enable government officials to develop sound transfer pricing rules that balance the needs of government and business, and to use their limited resources efficiently and effectively in auditing taxpayers. The program will give private sector tax professionals insight into the perspective of tax examiners.

Transfer pricing should not be a game, where taxpayers try to reduce their taxes inappropriately and tax administrators try to collect ever-increasing amounts of tax without regard to the facts. The course will help tax professionals create a sound, sensible transfer pricing program that benefits all parties.

The Faculty

Senior Fellow
Peter Barnes directs the program and is joined by other Duke faculty and leading experts in the field of transfer pricing. Economists and lawyers with many years of experience, including work with governments and international organizations, will lead the sessions.

Peter A. Barnes joined DCID in 2013 as a Senior Fellow teaching in the international taxation program. Previously he worked for more than 22 years as Senior International Tax Counsel for General Electric. Prior to GE, he worked for the U.S. Treasury Department from 1986 to 1991, concluding his time there as Deputy International Tax Counsel. He is also of counsel to the Washington law firm Caplin & Drysdale and a consultant to the UN tax committee. Barnes earned a B.A. from the University of North Carolina at Chapel Hill and a law degree from Yale University.

“Previously, I relied on my team members but after taking this course I can now say that I have the confidence to make decisions regarding transfer pricing on my own.”

Arieta Raitamata, participant
What topics will be covered?

**Background/Business Operations**
- Why transfer pricing is important: economic and tax policy issues
- Structure of multinational corporations and operation of global supply chains
- Use of databases, including how searches for comparables are conducted
- How companies set prices
- Digital commerce
- Development and use of intellectual property
- Tax policies to guide transfer pricing

**Transfer Pricing Principles**
- Traditional methods for setting prices
- Transactional methods for setting prices
- Simplified methods
- Safe harbors
- Use of databases
- UN and OECD guidelines

**Transfer Pricing Administration**
- Transfer pricing documentation
- Coordination of tax rules with customs valuation
- Advanced pricing agreements
- Treaty-based dispute resolution

Who should apply to this program?
The program is for individuals working in tax policy and tax administration, either as government officials or in the private sector with corporate taxpayers and advisory firms. Officials with ministries of finance and revenue agencies will benefit from this program.

The course will enable professionals to design a transfer pricing program that balances the competing needs of raising proper revenue and creating a sound business environment.

Application Details

What is the application process?
To submit an application and to check for additional information, visit us online at dcid.sanford.duke.edu.

Priority application deadline:
May 6, 2016

When and where will this program be held?
June 5-10, 2016
Duke Center for International Development (DCID)
Sanford School of Public Policy
Duke University
Durham, North Carolina, U.S.A.

2016 program fee: $3,500

What is included?
Program fee includes housing, local transportation, emergency medical insurance, course materials, social activities (optional), use of a laptop computer for the duration of the program, and access to the Duke University Libraries and computer facilities.

Participants are typically sponsored by their employer or a funding organization. Candidates should approach their current employer or other funding organizations as soon as possible to obtain financial support. Duke University and DCID do not offer scholarships or financial aid. Please contact DCID for more information.

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Duke University & DCID  Duke University is a world-class academic institution and one of the top 10 universities in the United States. It is an independent, comprehensive, coeducational research university that offers a variety of outstanding undergraduate and graduate programs consistently ranked at or near the top of their respective fields.

The Duke Center for International Development (DCID) is an interdisciplinary training, advisory, and research unit offering cutting-edge graduate degree and executive education programs in international development policy. DCID is a unit within the Sanford School of Public Policy.