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 a multi-national 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 provides policymakers and administrators with insight into the complex world of transfer pricing, enabling government officials to develop sound rules that balance the needs of government and business, and to use their limited resources efficiently and effectively in auditing taxpayers. The program also gives private sector tax professionals a strong understanding of transfer pricing and 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.

“The program provided excellent content and discussion among a wide variety of industry participants, including taxpayers, advisors and taxing authorities from multiple countries. However, the best part of the program was the knowledgeable and experienced faculty.”

William Lee, participant

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.
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
- Developing country perspectives
- Advanced pricing agreements
- Treaty-based dispute resolution

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The Duke Center for International Development (DCID) is an interdisciplinary education, 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.

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