

SESSIONS

WEBINAR 1 - 10/06/2020

TP Minds Digital

Every Wednesday starting 10 June

16:00 AEST | 07:00 BST

Year End Planning and IFRIC 23

07:00 - 08:00

Overview:

Multinational groups living in uncertain economic times may be questioning how to address their year-end closing processes in a world that has been impacted by unprecedented disruptions to global workforces, supply chains and customer demand. It is likely that financial results and transfer pricing outcomes will experience significant impact due to the far-reaching extent of the ongoing global economic disruption.

This practical webinar will provide you with insights on how COVID-19 impacts Transfer Pricing arrangements, how to assess the Transfer Pricing risks it presents and strategies to best navigate these risks during the year-end close. This discussion will be particularly relevant for June year end companies which have faced much of the downside impact of COVID-19 since February this year but not yet seen the consequences of a V or U shaped upturn as businesses strive to continue operations in this uncertain environment.

Coverage Includes:

- Modelling financial outcomes and identifying potential transfer pricing risks
- Identifying inconsistencies between FY2020 outcomes and the pre-COVID-19 transfer pricing characterisation
- Considerations for existing transfer pricing policies covering, for example, royalties, limited risk or 'routine' entities and financing arrangements
- Assessing the impact of uncertain positions on the financial statements under IFRIC 23

Level of analysis required to support year end positions from a tax and accounting perspective and additional evidence which may be required post year end.

Participants

Panel Member:: Zara Ritchie - Head of Global Transfer Pricing Services , BDO

Panel Member:: Sharon Arasu - Head of Tax & Treasury, CARSALES

Panel Member:: Michael Smith - Partner, Transfer Pricing, BDO

Panel Member:: Aletta Boshoff - Partner; National Leader, IFRS Advisory, BDO

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WEBINAR 2 - 17/06/2020

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Every Wednesday starting 10 June

16:00 AEST | 07:00 BST

Managing TP in the Short & Long Term

07:00 - 08:00

As the economic impact of COVID-19 continues to escalate, multinational groups may find that established Transfer Pricing policies no longer give rise to arm's length outcomes due to unprecedented disruptions to global workforces, supply chains and customer demand. It is likely that most groups will experience at least some impact due to the far-reaching extent of the ongoing global economic disruption.

This webinar will cover the key issues and concerns, hand picking the most contentious issues multinationals are dealing with and set the scene for a series of deeper discussions across a number of areas impacted as a result of COVID-19. The panel will focus on practical examples and insights across common areas such as losses, adjusting transfer pricing policies in relation to limited risk or routine entities, service arrangements, royalties, and funding.

Also covered will be the interaction between transfer pricing policies and government stimulus measures and what needs priority versus defer until later.

Participants

Panel Member:: Zara Ritchie - Head of Global Transfer Pricing Services , BDO

Panel Member:: Joel Phillips - Partner, Transfer Pricing, BDO

Panel Member:: Linda Besenyei - Senior Global Transfer Pricing Manager, EURONET

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WEBINAR 3 - 24/06/2020

TP Minds Digital

Every Wednesday starting 10 June

16:00 AEST | 07:00 BST

Can You Afford Not To Review Your Transfer Pricing Agreements In The COVID-19 Environment?

07:00 - 08:00

Overview:

As COVID-19 pandemic continues to cause widespread disruption, almost all multinational organisations will be forced to formulate precautionary measures to mitigate risks. Restructured arrangements will be implemented swiftly and often with little thought as to the wide-ranging implications to the organisation's transfer pricing policies and the legal agreements that have been implemented to document them. The panellists will share practical transfer pricing and legal insights in relation to related party agreements, including potential cash flow and tax implications when transfer pricing agreements are ignored.

Coverage Includes:

- What are the benefits of having related party agreements in place?
- What opportunities from the COVID-19 environment may arise and can this help to manage cash flow?
- Can ignoring related party agreements result in additional tax costs?
- I have not restructured my business. Do I still need to amend related party agreements?
- I do not have a force majeure clause, can I still amend my agreement?

Participants

Panel Member:: Zara Ritchie - Head of Global Transfer Pricing Services , BDO

Panel Member:: Joel Phillips - Partner, Transfer Pricing, BDO

Panel Member:: Paul Sutton - Co-Founder, LCN LEGAL

Panel Member:: Patrick O'Sullivan - Group Tax Manager, MNF Group

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WEBINAR 4 - 01/07/2020

TP Minds Digital

Every Wednesday starting 10 June

16:00 AEST | 07:00 BST

Cross Border Financing Arrangements - How to Manage and Benefit in a World Impacted by COVID-19

07:00 - 08:00

Overview:

Availability of cash can make or break businesses and is an especially important topic during periods of economic uncertainty and downturn. Should you continue with existing arrangements or refocus your cross border financing arrangements? Is your balance sheet negatively affected by COVID-19? If so, are you likely to fail the thin capitalisation safe harbour test? Are there any positive developments that maybe useful for your business? This practical webinar will provide you with insights and examples on how COVID-19 impacts transfer pricing financing arrangements, available ATO concessions and likely ATO approach to compliance.

Coverage Includes:

- Considerations and options to vary terms and conditions in existing agreements
- Approach to interest free loans
- How to approach short term financing needs in a flexible manner
- Role of ATO practical compliance guidelines and risk assessment (i.e. traffic lights system) for COVID-19 impacted companies
- ATO concessions in relation to the entities falling outside of the thin capitalisation safe harbour due to COVID-19 impact
- Role of arm's length debt test and benchmarking for comparable companies
- Documenting the arrangements so as to mitigate penalties

Participants

Panel Member:: Michael Smith - Partner, Transfer Pricing, BDO

Panel Member:: Natalya Marenina - Partner, Transfer Pricing, BDO

Panel Member:: Tien Phan - Acting Assistant Commissioner – International Tax Structuring, Australian Taxation Office

Panel Member:: Nicholas Trotman - International Tax Structuring, Australian Taxation Office

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