

## COURSE INTRODUCTION

# TRANSFER PRICING

Updated Vietnam Tax Regulations in 2017



### WHY CHOOSE THIS COURSE?

On February 24th 2017, The government issued Decree 20/2017/NĐCP (Decree 20) regulating Tax Management to businesses who have related transactions. Decree 20 presents some important changes compared with current rules of Tax Management for related transaction under Circular 66/2010/TT-BTC and officially applies some proposals of the Organization of Economic Co-Operation and Development (OECD) about Base Erosion and Profit Shifting (BEPS). Currently, The Ministry of Finance is also asking for contribution for Circular Draft instructing application of Decree 20.

Although, Decree 20 only become valid on May 1st 2017, it has many new rules that will affect the business strategy, price policy and duty to abide of company in 2017. Therefore, companies having related transactions need to research and proactively have plan for appropriate abiding to new rules.

### WHO IS THIS COURSE FOR?

- Board of Directors, CFO, Finance Directors/ Managers, Tax Directors/ Managers
- Professionals in charge of Tax, Finance and Accounting of multinationals companies, Vietnamese businesses having related transactions
- Tax and Pricing consultants
- Officials administering fields relevant to Economics and Legal

### COURSE OUTLINE

The course covers the following topics:

- Brief updates on the OECD's BEPS Project;
- Key changes of the new TP Decree (Decree 20) and new draft TP Circular:
  - Effective date/applicable financial year;
  - Covered related party relationships and related party transactions;
  - Principle of substance over form;
  - TP methods, comparability analysis and comparable data/information;
  - Year-end TP adjustments and application of median of the range;
  - Three tiered TP documentation (Master File, Local File and Country by Country Report);
  - New TP Disclosure Form;
  - TP compliance exemption (safe harbor rules);
  - Requirements for deductibility of related party service expenses;
  - Limitation of deductibility of related party interest expenses;
  - Vietnam based companies with simple functions shall not bear losses;
- Trends and insights of TP specific inspections and typical cases;
- Consequence of TP non-compliance;
- TP dispute resolutions and Advance Pricing Agreement (APA);
- Best practices in managing TP risks in Vietnam
- Q&A

**COURSE DURATION** 01 day (7 hours)

**STARTING DATE** 14 October 2017

**TUITION FEE** 2,000,000 VND

#### Note:

- 10% Early Bird discount will be offered to learners in VSIP who enrolls before 30 September 2017
- An additional offer of 5% tuition fee will be made for group enrolments (at least 3 people)

**VENUE:** Smart Train HCM: 9th Floor, Giay Viet Plaza, 180-182 Ly Chinh Thang St., D.3, HCMC

### WHAT ARE THE COURSE OUTCOMES?

By the end of this course, participants will be able to:

- Recognize the important changes between Decree 20 and Circular 66
- Update the process of executing BEPS and some important contents presented in Decree 20
- Understand duties to abide and potential risks in executing Decree 20

### HOW IS THE COURSE DELIVERED?

- **Practice of real-life scenarios:** theory is clearly illustrated through the analysis of practical business cases and examples
- **Visual aids:** Training content is presented in a lively approach with Power Point, pictures, graphs and charts
- **Group Discussion:** group assignments enable learners to interact with one another, share knowledge and experience
- **Summary of theory:** summary of course content helps learners grasp the key theory and systemize knowledge acquired after the course.

### TRAINER'S BRIEF PROFILE

- Currently holding the position of Deputy General Director of International Tax Services – Transfer Pricing at one of Big 4s
- Having more than 16 years of experience on Transfer Pricing, tax and law of Vietnam
- Having Ph.D researching about Transfer Pricing in Sweden, Master of International Tax in Netherlands
- Authoring many articles, special subjects on Transfer Pricing in international Magazines

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