



# The Chamber of Tax Consultants

Estd. 1926  
ज्ञानं परमं बलम्

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## Learning Management Solution Online Learning Platform of the Chamber of Tax Consultants Brain Trust on Practical and Controversial Transfer Pricing issues

15<sup>th</sup> October, 2022

Sr. No.	Topic	Faculties
<b>Brain Trust Session 1- Discussion on practical issues on benchmarking/ documentation</b>		
1	1) Economic Adjustments 2) Most Appropriate Method / Benchmarking 3) Tested Party / Profit Level Indicators 4) Three-Tier Documentation 5) Others key topics in transfer pricing	<b>Moderator</b> - Mr. Vispi Patel <b>Panelist</b> : Mr. Vijay Iyer (EY) Mr. Waman Kale (KPMG) Mr. Bhupendra Kothari (Deloitte)
<b>Brain Trust Session 2- Recent controversies in Transfer Pricing/ Dispute Resolution Mechanisms</b>		
2	1) Key transfer pricing controversies a) AMP/ DEMPE b) Intra-group services c) ESOP d) Substance over form e) Use of CUP vis-à-vis TNMM f) Maintenance of TP documentation by Non-residents 2) Faceless Assessment Proceedings 3) 10 Years of APA / MAP resolution	<b>Moderator</b> : Ms. Karishma R. Phatarphekar <b>Panelist</b> : Mr. Amit Shukla (Hon'ble ITAT Judicial member) Mr. Bipin Pawar (PwC) Ms. Manisha Pande (Baker Hughes)

### LMS Fees :

**CTC Members** : Rs. 1000/- + Rs. 180/- (GST) = **Rs. 1,180/-**

**Non Members** : Rs. 1500/- + Rs. 270/- (GST) = **Rs. 1,770/-**