

# Transfer Pricing Masterclass



**Date:** 21st June 2019  
**Time:** 8am to 5pm  
**Venue:** Cristal Advocates, 4th Floor, Padre Pio Building, Plot 32 Lumumba Avenue - Kampala, Uganda  
**Investment** USD 150  
**Contact** Lynette Ankunda for additional course details  
[linkunda@cristaladvocates.com](mailto:linkunda@cristaladvocates.com)  
**+256 414 671 274**

## FACILITATORS



**Bill Page**

With many years of wide international experience, Bill is a leading global tax and energy practitioner and Senior Advisor at Cristal Advocates. Between 1986 and 1998, he was based in London with the UK tax authorities and big four accounting firms. From 1998 to 2004, Bill was based in Kazakhstan working across the Caspian region with Deloitte. From 2004 to 2008, he worked in Russia leading Deloitte's oil and gas industry group but also as Tax Partner. He moved to East Africa in 2009 leading Deloitte East Africa Energy and Resources Industry Group but also as Tax Partner overseeing the Uganda and Tanzania offices. He returned to the UK in 2014 to support Deloitte overseas offices working on outbound projects investing in Africa as well as a key member of the firm's global energy and resource practice until his retirement in September 2018.

Bill has facilitated several tax and energy trainings in Uganda, Kenya, Tanzania, Mozambique, Ghana, Russia, United Kingdom and Kazakhstan. He is a graduate of the University of Oxford and completed his inspectors' training with the UK Inland Revenue in 1989.



**Denis Yekoyasi Kakembo**

Denis is a tax and corporate lawyer and the Managing Partner at Cristal Advocates where he also leads the energy and tax practice. He is dual qualified as a Lawyer and Chartered Accountant with vast consulting experience on projects in Sub Saharan Africa. Before joining Cristal Advocates, he had worked for close to 10 years with Deloitte where he started his career as a tax and legal trainee and rose to senior managerial roles. Initially based in Uganda, he was seconded to live and work in Tanzania, United Kingdom and Kenya and subsequently became Deloitte East Africa's Chief of Staff for the Energy and Resources Industry Group.

He is widely published both in the local and international media on general and specific tax matters especially the energy sector. He has facilitated several tax, energy and legal trainings in Uganda, Kenya, Tanzania and the United Kingdom. He has been a trainer for executive courses at the Strathmore University Extractive Industry Centre in Kenya and more recently the Africa Mining Legislation Atlas under the Africa Development Bank.

He holds a Master of Laws degree in Petroleum Taxation and Finance from the University of Dundee in the United Kingdom, a Post Graduate Diploma in Legal Practice and a Bachelor of Laws degree from Makerere University.

## COURSE OUTLINE

21<sup>st</sup> June 2019

S/N	Title	Content
1	<b>Introduction to transfer pricing</b>	<ul style="list-style-type: none"><li>• The arm's length principle</li><li>• Development of transfer pricing rules</li><li>• Role of the UN and OECD</li></ul>
2	<b>Overview of Uganda's transfer pricing regime</b>	<ul style="list-style-type: none"><li>• Income Tax Act, section 90</li><li>• Transfer Pricing Regulations, 2011</li><li>• 2012 Practice Note</li><li>• Interaction with other taxes</li></ul>
3	<b>Transfer pricing methods</b>	<ul style="list-style-type: none"><li>• Comparable uncontrolled price</li><li>• Resale price</li><li>• Cost plus</li><li>• Transactional net margin</li><li>• Transaction profit split</li><li>• Other methods</li></ul>
4	<b>Benchmarking</b>	<ul style="list-style-type: none"><li>• Requirements of the 2012 Practice Note</li><li>• International norms</li><li>• Master file and local files</li></ul>
5	<b>Audit and dispute resolution</b>	<ul style="list-style-type: none"><li>• URA audit and information gathering powers</li><li>• Conduct of transfer pricing audits</li><li>• Dispute resolution options</li></ul>
6	<b>International developments</b>	<ul style="list-style-type: none"><li>• BEPS actions relating to transfer pricing</li><li>• Alternative approaches</li></ul>
7	<b>Case study</b>	
8	<b>Wrap-up</b>	

