



# TAXES

Two Days Workshop on

# INTERNATIONAL TAXATION & TRANSFER PRICING



9:00 AM to 6:00 PM



February 18 & 19, 2025  
Tuesday & Wednesday



Marriott Hotel,  
Karachi

**Day 1**

International Taxation, Double Tax Treaties & Multilateral Instruments

**Day 2**

Transfer Pricing & Related Documentation

## Facilitators:



**Mr. Zeeshan Zafar Khan**  
Partner Tax  
KPMG Pakistan



**Mr. Muzammil Hemani,**  
**ACA, LLB, ADIT(UK)**  
Partner Tax & Legal Services  
Hemani Basrawala & Co.



**Ms. Taha Baqai, FCA**  
Partner Tax  
A.F. Ferguson & Co.



**Mr. Asif Zafer, FCA**  
Director Tax  
EY Pakistan

## Guest Speakers:



**Mr. Adil Rao**  
Partner MENA  
International Tax & Transfer Pricing  
EY Dubai, UAE



**Mr. Asif Haroon, FCA**  
Partner Tax  
A.F. Ferguson & Co.



**Mr. Haider Patel, FCA**  
Partner Tax  
EY Ford Rhodes



**Mr. Muhammad Raza, FCA**  
Partner Tax  
A.F. Ferguson & Co.



**Mr. Khalid Mahmood, FCA**  
Partner Tax  
KPMG Taseer Hadi & Co.



**Mr. Atif Mufassir, FCA**  
Partner Tax  
Yousuf Adil

## Day 01: International Taxation- Dignitaries

**Guest of Honour**



**Mr. Zubair Bilal**  
Chief Commissioner  
Large Taxpayers Office

**Chief Guest**



**Mr. Shaikh Saqib Masood**  
Past President  
ICAP

## Day 02: Transfer Pricing- Dignitaries

**Guest of Honour**



**Mr. Muhammad Awais, FCA**  
Council Member &  
Chair of Fiscal Laws Committee  
ICAP

**Chief Guest**



**Dr. Najeeb Ahmad**  
Member (Policy)  
Federal Board of Revenue  
Islamabad

## Organizing Team:



**Mr. Abdul Qadir Memon**  
Chairman PTBA Academy of Taxation  
& Former Patron and President  
Pakistan Tax Bar Association



**Mr. Usama Rashid, FCA**  
CPD Convener  
SRC ICAP



**Syed Junaid Ali, FCA**  
Chairman  
SRC ICAP

## Overview:

This two-day workshop is being organized by Southern Regional Committee of ICAP in collaboration with PTBA Academy of Taxation. The workshop is designed to provide participants with a practical understanding of key aspects of international taxation and transfer pricing. It covers the role of Double Tax Treaties (DTTs) in cross-border transactions, equipping professionals with the knowledge to navigate treaty provisions, ensure compliance, and optimize tax outcomes for businesses operating across jurisdictions. Additionally, the workshop offers a comprehensive overview of transfer pricing principles, regulatory requirements, and documentation preparation, enabling tax consultants, finance professionals, corporate executives, and regulators to effectively manage compliance, mitigate risks, and enhance transparency in intercompany transactions.

## Key Takeaways:

- Understand the purpose and key provisions of Double Tax Treaties (DTTs) to rationalize withholding taxes and double taxation.
- Explore the impact of the OECD BEPS framework and the Multilateral Instrument (MLI) on existing treaties.
- Develop skills for treaty interpretation and compliance documentation.
- Gain insights into the Arm's Length Principle (ALP) and global transfer pricing frameworks.
- Learn methods for determining transfer prices and preparing Master File, Local File, and CbCR documentation.
- Acquire skills to perform benchmarking analyses and manage transfer pricing risks effectively.
- Obtain familiarity with landmark international judgements and their implications for Pakistani businesses.

## Who Should Attend:

- Tax and finance professionals managing international transactions.
- Corporate executives responsible for cross-border tax planning and compliance.
- Legal advisors and consultants specializing in international tax matters.
- Regulators and policymakers seeking a deeper understanding of tax treaties & transfer pricing.



# Workshop Structure:

The workshop will feature a mix of lectures, interactive discussions, practical case studies and government's view in order to provide a well-rounded understanding of the topic. Participants will also have the opportunity to engage in group activities and Q&A sessions to address specific challenges and queries.

## Contents:

### Day 1 – International Taxation, Double Tax Treaties & Multilateral Instruments

- What is International Taxation?
- Key concepts: Residence-based vs. source-based taxation.
- Understanding global income and double taxation.
- Importance of international tax frameworks in cross-border transactions.
- Fundamentals of Double Tax Treaties.
- Treaty interpretation guidelines under the Vienna Convention.
- Allocation of income.
- Domestic law of Pakistan about Double Tax Treaties.
- Different types of Model Tax Conventions.
- Pakistan & its Double Tax Treaties.
- Classification of articles of Double Tax Treaties.
- Methods of Elimination of Double Taxation.
- Concept of Residence & Article 4.
- Discussion on all the articles of Double Tax Treaties.
- Articles of Double Tax Treaties related to withholding taxes.
- Permanent Establishment, Types & Business Profits.
- International Taxation & Income Tax Ordinance, 2001.
- Multilateral instruments.
- Introduction to the OECD BEPS framework and its impact on DTTs.
- Reporting obligations for cross-border transactions.
- MAP & Exchange of information in relevance to Pakistan.
- Thin capitalization rules.



# Day 2 – Transfer Pricing & Related Documentation

- Introduction to transfer pricing.
- Brief history of transfer pricing legislation.
- What are international transactions.
- Concept and definition of related parties
- Transfer pricing and relevant articles of Model Tax Convention.
- Transfer pricing approaches.
- Transfer pricing methods.
- Functional & Comparability analysis.
- Benchmarking.
- Requirements for local file, master file and CbCR.
- Importance of contemporaneous documentation.
- Transfer pricing in specific transactions.
- MNCs and Transfer Pricing.
- Landmark judgements on transfer pricing – local & international.
- Local provisions pertaining to transfer pricing.
- APAs, CCAs, CSAs & Safe Harbours.
- Overview of transfer pricing rules in Pakistan
- Transfer pricing penalties and compliance risks
- Transfer pricing audit process.
- Transfer pricing dispute resolution.

## Jointly Organized By:

**The Southern Regional Committee (SRC)** of the Institute of Chartered Accountants of Pakistan (ICAP) is responsible to provide its members with a platform for Continuing Professional Development (CPD) via programmes for professional updates and enhancement of soft skills. CPD activities are provided through seminars, conferences and workshops, etc.

**PTBA Academy of Taxation**, a not-for-profit organization licensed under section 42 of the Companies Act, 2017 has been established with the primary objective “to promote taxation, corporate and allied laws education and/or by assisting the works of organization engaged in advancing taxation, corporate and allied laws including improving the services and management skills of professional’s practitioners, presenters, lecturers, teachers, facilitators and other related persons, and to actively work with national institutions to publish statutes & relevant materials, conduct awareness campaigns, conferences, workshops, seminars, etc. and to assist such institutions in research work in the related areas”.

## Investment

**PKR 75,000/-**

Early bird discount: 15% Till February 03, 2025  
Group Discount for single organization on 3 or  
More Registrations: 10% (Per Participant)  
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### For Further Information

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