

International Fiscal Association

(SINGAPORE BRANCH)

2007 EVENING TALK PROGRAMME

- Topic :** Australian Taxation Office (ATO) - transfer pricing policy and administration
- Speaker :** John A. Donaldson
CRA International, Melbourne, Australia
- Date :** 12 November 2007 (Monday)
- Venue :** Drew & Napier
20 Raffles Place
#17-00 Ocean Towers
Singapore 048620
- Time :** 6.30 p.m. Light refreshments
7.00 – 8.30 p.m. Presentation
- Cost :** \$25 for members; \$60 for non-members
(Corporate members may send two delegates at member rate)
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Mr John A. Donaldson has more than 30 years of experience in taxation law and economic consulting with focus on transfer pricing issues, such as documentation and planning, audit defence strategies, advance pricing agreements and negotiations with revenue authorities, particularly in the Asia Pacific region. Mr Donaldson served previously in the Australian Taxation Office from 1972 to 1989 in various line officer positions before becoming an Asst Commissioner in the Policy and Legislation Division, where he led a team in the development of tax policy with regard to domestic and international projects, instructed Parliamentary Counsel on drafting proposed laws, oversaw draft legislation, and prepared explanatory memoranda utilised in the implementation of new national tax laws. He joined KPMG in 1989 and was made partner in 1994. While partner there, Mr Donaldson established the firm's transfer pricing practice in Melbourne. In 2002, he established Donaldson Economic Consulting, and worked principally with a major multinational company based in Europe, spearheading their in-house transfer pricing team. In 2005, he joined the Ballentine Barbera Group in Australia as a Principal. In June 2006, he was appointed as Vice President of CRA International, a position he has held since then.

In his talk, Mr Donaldson will give an overview of the ATO audit program for 2008 and also cover the following:

- Key points from the Commissioner's recent address to the Australian Institute of Corporate Directors;
- Review of ATO APA program currently underway with external advisors;
- ATO MAP program and impact of recent departure of 2 top ATO transfer pricing officials and appointment of new head of Transfer Pricing, Anne Connon;
- Asia Pacific regional issues involving economic nationalism, especially from the NTA in Japan, and its impact on other Asian countries, comparables and their relevance, including market adjustments;
- Relationship between ATO and NTS in China;
- ATO's position on marketing intangibles and business "restructurings"

If you wish to attend the talk, kindly complete the attached booking form, and return it together with your payment to the address as stated.

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Booking Form

Australian Taxation Office - transfer pricing policy and administration
12 November 2007

To: Phyllis Ng
KPMG Asia Pacific, Tax
16 Raffles Quay #22-00
Hong Leong Building
Singapore 048581

Tel: 6213 3980

Fax: 6224 1345

E-mail: phyllisng@kpmg.com.sg

Name : _____

Company : _____

Tel : _____ E-mail/ Fax : _____

Guest(s) : _____

Cheque* enclosed for S\$ _____

*Seat will only be confirmed upon receipt of payment by **9 November 2007**.

Please make your cheque payable to **International Fiscal Association (Singapore Branch)**.