Advanced Transfer Pricing: Methods & Documentation Training Course

Professional Development Training Course Outline

Category	Taxation and Revenue	**Duration**	10 Days
Base Fee	$3,000 USD	**Delivery Mode**	Online / On-site Hybrid

Course Introduction

Advanced Transfer Pricing: Methods & Documentation Training Course offers an in-depth exploration of contemporary transfer pricing practices, documentation requirements, and compliance strategies. Participants will gain a comprehensive understanding of global transfer pricing regulations, risk management techniques, and intercompany pricing methods. The course emphasizes practical applications of the arm's length principle, aligning corporate strategies with regulatory expectations. Through interactive case studies and real-world scenarios, professionals will be equipped to navigate complex transfer pricing challenges while optimizing tax efficiency.

This program also addresses emerging trends in transfer pricing, including digital economy considerations, BEPS (Base Erosion and Profit Shifting) compliance, and cross-border tax planning. Participants will learn to design robust transfer pricing policies, conduct benchmarking analyses, and prepare defensible documentation. By the end of this course, attendees will possess the knowledge to mitigate transfer pricing risks, enhance corporate governance, and ensure regulatory compliance in a global business environment.

Programme Curriculum

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Course Objectives

1. Understand the fundamentals and advanced principles of transfer pricing
2. Analyze and apply the arm's length principle in diverse scenarios
3. Design and implement transfer pricing policies for multinational enterprises
4. Conduct functional and risk analyses for intercompany transactions
5. Select appropriate transfer pricing methods for tangible and intangible assets
6. Perform benchmarking studies using reliable data sources
7. Prepare comprehensive transfer pricing documentation in compliance with OECD guidelines
8. Navigate BEPS Action Plans and understand their impact on multinational operations
9. Manage audits and resolve disputes with tax authorities effectively
10. Integrate digital economy considerations into transfer pricing strategies
11. Optimize intercompany pricing for tax efficiency and regulatory alignment
12. Utilize transfer pricing software and data analytics tools for documentation and analysis
13. Develop sustainable strategies for global tax planning and risk mitigation

Target Audiences

1. Tax managers and advisors
2. Financial controllers and CFOs
3. Internal auditors and compliance officers
4. Transfer pricing specialists
5. Multinational enterprise finance teams
6. Corporate tax consultants
7. Accounting professionals handling cross-border transactions
8. Legal professionals specializing in international tax law

Course Duration: 10 days

Course Modules

Module 1: Introduction to Advanced Transfer Pricing

- Overview of global transfer pricing regulations
- Key principles and terminology
- Understanding arm's length transactions
- Challenges in multinational environments
- Case study: Transfer pricing policy design for a multinational corporation
- Practical exercises on intercompany pricing

Module 2: Functional and Risk Analysis

- Identifying functions, assets, and risks
- Evaluating contractual arrangements
- Comparing operational practices across subsidiaries

- Risk allocation and its impact on pricing
- Case study: Functional analysis of an intercompany service arrangement
- Interactive scenario exercises

Module 3: Transfer Pricing Methods – Traditional Transactional Methods

- Comparable uncontrolled price (CUP) method
- Resale price method
- Cost-plus method
- Applicability in different sectors
- Case study: Application of cost-plus method for manufacturing
- Exercises on method selection

Module 4: Transfer Pricing Methods – Profit-Based Methods

- Transactional net margin method (TNMM)
- Profit split method
- Residual profit split method
- Method selection criteria and challenges
- Case study: Profit split for joint venture operations
- Practical exercises with sample financials

Module 5: Intangible Assets and Transfer Pricing

- Identifying and valuing intangible assets
- Licensing and royalty arrangements
- IP transfer pricing strategies
- Documentation requirements for intangibles
- Case study: Valuation of intellectual property in a tech company
- Group exercise on royalty computation

Module 6: Transfer Pricing Documentation

- OECD documentation standards
- Master file, local file, and country-by-country reporting
- Preparing defensible documentation
- Supporting benchmarking studies
- Case study: Preparing full transfer pricing documentation
- Documentation review exercises

Module 7: Benchmarking Analysis and Data Sources

- Selecting reliable data sources
- Preparing comparability analyses
- Adjustments for differences in functions and risks
- Evaluating industry-specific trends
- Case study: Benchmarking for intercompany services
- Exercises on database selection and analysis

Module 8: Digital Economy and Transfer Pricing

- Challenges of digital business models

- Intangibles and user contribution analysis
- Allocation of profits for digital services
- Emerging regulatory frameworks
- Case study: Transfer pricing for a digital platform
- Practical exercises on digital transaction pricing

Module 9: BEPS Action Plans and Compliance

- Overview of BEPS initiatives
- Action Plans 8-10 on transfer pricing
- Country-specific compliance considerations
- Documentation and reporting obligations
- Case study: BEPS compliance for a multinational enterprise
- Risk assessment exercises

Module 10: Transfer Pricing Audit and Dispute Resolution

- Audit triggers and procedures
- Handling tax authority inquiries
- Documentation defense strategies
- Negotiating APAs (Advance Pricing Agreements)
- Case study: Transfer pricing audit simulation
- Role-play exercises

Module 11: Intercompany Financing and Transfer Pricing

- Pricing of loans and guarantees
- Thin capitalization rules
- Debt vs equity considerations
- Documentation of financing arrangements
- Case study: Transfer pricing for intercompany loans
- Financial modeling exercises

Module 12: Cost Sharing Agreements and Joint Ventures

- Principles of cost sharing
- Contribution and benefit allocation
- Documentation requirements
- Risk and reward sharing
- Case study: Cost sharing arrangement in an R&D project
- Practical exercises on allocation

Module 13: Transfer Pricing in Supply Chain Management

- Impact of supply chain structure on pricing
- Value creation and margin allocation
- Cross-border procurement challenges
- Transfer pricing adjustments
- Case study: Supply chain restructuring for transfer pricing compliance
- Scenario-based exercises

Module 14: Emerging Trends and Advanced Issues

- Global tax reforms
- Digital services taxation
- Intangibles and hard-to-value assets
- Transfer pricing controversies
- Case study: Handling complex multinational transactions
- Discussion and analysis exercises

Module 15: Practical Application and Case Studies

- Integrating knowledge from all modules
- Comprehensive case study of multinational transfer pricing
- Preparing documentation for audit defense
- Scenario-based problem solving
- Group presentations and peer review
- Hands-on exercises with financial datasets

Training Methodology

- Interactive lectures with practical examples
- Real-world case studies for hands-on learning
- Group exercises to enhance collaboration and problem-solving
- Role-playing scenarios for audits and dispute resolution
- Use of transfer pricing databases and software tools
- Continuous assessment through quizzes and exercises

Organizational Benefits

- Strengthened compliance with global transfer pricing regulations
- Enhanced accuracy and defensibility of transfer pricing documentation
- Reduced risk of audit penalties and adjustments
- Improved tax planning and intercompany pricing strategies
- Strengthened internal controls and governance
- Enhanced staff capability in handling complex transactions
- Better alignment of transfer pricing with corporate strategy
- Increased efficiency in transfer pricing reporting
- Reduced exposure to double taxation risks
- Support for strategic decision-making in multinational operations

10 Additional Bulletins After Objectives

- Introduction to OECD Transfer Pricing Guidelines
- Understanding multinational taxation structures
- Key concepts in profit allocation
- Master file and local file preparation
- Country-by-country reporting requirements
- Transfer pricing for intangibles and digital services
- Risk-based approach to transfer pricing audits
- Transfer pricing adjustments and documentation defenses
- Emerging trends in global transfer pricing
- Best practices for intercompany transaction compliance

Register as a group from 3 participants for a Discount

Send us an email: info@fineskilltrainingcenter.org or call *+254769199797*

Certification

Upon successful completion of this training, participants will be issued with a globally- recognized certificate.

Tailor-Made Course

We also offer tailor-made courses based on your needs.

Key Notes

a. The participant must be conversant with English.

b. Upon completion of training the participant will be issued with an Authorized Training Certificate

c. Course duration is flexible and the contents can be modified to fit any number of days.

d. The course fee includes facilitation training materials, 2 coffee breaks, buffet lunch and A Certificate upon successful completion of Training.

e. One-year post-training support Consultation and Coaching provided after the course.

f. Payment should be done at least a week before commence of the training, to Fineskill Training Center account, as indicated in the invoice so as to enable us prepare better for you.

Upcoming Scheduled Sessions

Start Date	End Date	Location	Price
23 Nov 2026	04 Dec 2026	Online	$2,000
23 Nov 2026	04 Dec 2026	Physical	$3,000
23 Nov 2026	04 Dec 2026	Physical	$6,000
23 Nov 2026	04 Dec 2026	Physical	$6,000
23 Nov 2026	04 Dec 2026	Physical	$12,000
23 Nov 2026	04 Dec 2026	Physical	$9,000
23 Nov 2026	04 Dec 2026	Physical	$12,000
23 Nov 2026	04 Dec 2026	Physical	$12,000

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