Advanced Transfer Pricing: Value Chain Analysis and Controversy Training Course

Professional Development Training Course Outline

Category	Taxation and Revenue	**Duration**	5 Days
Base Fee	$1,500 USD	**Delivery Mode**	Online / On-site Hybrid

Course Introduction

Advanced Transfer Pricing: Value Chain Analysis and Controversy Training Course provides an in-depth understanding of how multinational enterprises (MNEs) can effectively align transfer pricing strategies with global value creation. Participants will explore the advanced concepts behind value chain analysis (VCA), profit attribution, and intercompany pricing of intangibles, services, and goods. The program equips professionals with the technical and analytical skills needed to assess value drivers, evaluate business models, and manage the tax implications of global value chains.

Moreover, the course delves into the growing landscape of transfer pricing controversies, including audits, disputes, and evolving OECD and UN frameworks. Participants will learn how to design robust documentation, defend transfer pricing positions during litigation, and implement proactive risk mitigation strategies. By the end of the training, participants will possess the knowledge to navigate complex pricing issues, enhance compliance, and safeguard multinational tax structures against regulatory scrutiny and double taxation risks.

Programme Curriculum

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Course Objectives

By the end of this course, participants will be able to:

1. Understand advanced concepts in transfer pricing and value chain analysis.
2. Evaluate how business models and functions influence profit allocation.
3. Analyze key value drivers and risk-bearing entities in multinational operations.
4. Apply OECD Transfer Pricing Guidelines to complex transactions.
5. Conduct functional, asset, and risk (FAR) analyses effectively.
6. Utilize value chain mapping for strategic tax planning.
7. Identify and mitigate transfer pricing risks and controversies.
8. Prepare robust transfer pricing documentation and reports.
9. Defend pricing policies during audits and dispute resolution processes.
10. Integrate digital and data-driven tools in transfer pricing management.
11. Understand the implications of BEPS, Pillar One, and Pillar Two reforms.
12. Manage cross-border intercompany pricing for intangibles and services.
13. Formulate strategies for dispute prevention, MAPs, and Advance Pricing Agreements (APAs).

Target Audience

- Transfer pricing managers and specialists
- Tax directors and advisors
- Financial controllers and CFOs
- International tax consultants
- Policy analysts and auditors
- Legal and compliance professionals
- Economists and financial analysts
- Risk management officers in MNEs

Course Duration: 5 days

Course Modules

Module 1: Advanced Concepts in Transfer Pricing

- Overview of transfer pricing evolution and global trends
- Principles of arm’s length pricing and profit allocation
- Challenges in modern business models and intangibles
- The importance of economic substance over form
- Key documentation and regulatory developments
- Case study: Transfer pricing evolution post-BEPS

Module 2: Value Chain Analysis (VCA) Fundamentals

- Understanding the concept of value creation in global operations
- Identifying functions, assets, and risks in the value chain

- Mapping value flows across entities and jurisdictions
- Linking value chain analysis to transfer pricing outcomes
- Evaluating profit attribution to key value drivers
- Case study: Value chain realignment in a global tech firm

Module 3: Functional, Asset, and Risk (FAR) Analysis

- Conducting detailed functional analyses in MNE structures
- Assessing intangibles, ownership, and contribution to value
- Identifying economically significant risks
- Allocating returns among related parties
- Ensuring consistency between legal agreements and actual conduct
- Case study: FAR analysis in manufacturing and distribution

Module 4: Intangibles and Transfer Pricing

- Defining and categorizing intangibles under OECD guidelines
- DEMPE framework (Development, Enhancement, Maintenance, Protection, Exploitation)
- Pricing methodologies for intangibles and royalties
- Valuation of hard-to-value intangibles (HTVIs)
- Addressing digital intangibles and IP migration risks
- Case study: IP valuation controversy in pharmaceutical sector

Module 5: Transfer Pricing Controversies and Audits

- Common causes of disputes and audit triggers
- Responding to information requests and tax authority reviews
- Strategies for handling transfer pricing adjustments
- Managing documentation and defense files under scrutiny
- Impact of Pillar Two and transparency rules on controversies
- Case study: High-profile multinational transfer pricing dispute

Module 6: Dispute Resolution and Risk Mitigation

- Understanding Mutual Agreement Procedures (MAPs)
- Role of Advance Pricing Agreements (APAs) in risk management
- Arbitration and alternative dispute resolution mechanisms
- Practical steps for proactive controversy management
- Developing a global transfer pricing defense strategy
- Case study: APA success in automotive sector

Module 7: Digitalization and Transfer Pricing Technology

- Digital economy challenges and tax implications
- Using analytics and AI for risk monitoring
- eDocumentation and real-time data reporting systems
- Leveraging ERP integration for transfer pricing compliance
- Automating TP risk analysis and benchmarking studies
- Case study: Data-driven TP management in e-commerce

Module 8: Strategic Planning and Future Outlook

- Aligning tax strategy with business transformation
- Global convergence of tax reforms and transparency initiatives
- Managing reputational risk in public reporting
- Building resilient tax structures amid digital disruption
- Preparing for future TP trends and regulatory expectations
- Case study: Global minimum tax and its transfer pricing impact

Training Methodology

- Expert-led lectures and guided discussions
- Real-world multinational case study analysis
- Group workshops on functional and value chain mapping
- Scenario-based simulations and documentation exercises
- Practical sessions on dispute prevention and MAP strategies
- Interactive assessments and peer feedback

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	27 Nov 2026	Online	$1,000

Start Date	End Date	Location	Price
23 Nov 2026	27 Nov 2026	Physical	$1,500
23 Nov 2026	27 Nov 2026	Physical	$3,000
23 Nov 2026	27 Nov 2026	Physical	$3,000
23 Nov 2026	27 Nov 2026	Physical	$6,000
23 Nov 2026	27 Nov 2026	Physical	$4,500
23 Nov 2026	27 Nov 2026	Physical	$6,000
23 Nov 2026	27 Nov 2026	Physical	$6,000

Ready to enroll or request a customized program? Book online or contact us:

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