Transfer Pricing Risk Management 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

Transfer Pricing Risk Management Training Course provides a comprehensive understanding of how multinational enterprises (MNEs) and tax authorities identify, assess, and manage risks associated with transfer pricing. Participants will explore strategies for ensuring compliance with OECD guidelines, BEPS (Base Erosion and Profit Shifting) standards, and domestic transfer pricing regulations. The course emphasizes practical approaches to minimizing disputes, improving documentation quality, and strengthening internal governance structures.

This course also equips participants with analytical tools to evaluate transfer pricing risks, design risk control mechanisms, and manage audits and adjustments effectively. It combines global best practices, case-based learning, and data-driven insights to enable professionals to anticipate regulatory challenges and develop robust transfer pricing risk frameworks that promote tax certainty and transparency.

Programme Curriculum

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robust transfer pricing risk frameworks that promote tax certainty and transparency.

Course Objectives

1. Understand the fundamentals of transfer pricing and associated risk factors.
2. Analyze OECD and BEPS frameworks relevant to transfer pricing compliance.
3. Develop robust risk identification and assessment procedures for transfer pricing.
4. Learn methods for managing tax audits, adjustments, and dispute resolution.
5. Enhance documentation and record-keeping for transfer pricing defense.
6. Integrate transfer pricing governance into enterprise risk management systems.
7. Apply data analytics and technology to monitor intercompany transactions.
8. Evaluate financial and operational impacts of transfer pricing risks.
9. Strengthen internal controls for related-party transactions.
10. Interpret country-by-country reporting requirements and implications.
11. Develop strategies for proactive transfer pricing compliance.
12. Understand tax authority risk assessment models and audit triggers.
13. Learn from global case studies of transfer pricing disputes and resolutions.

Organizational Benefits

- Enhanced compliance with global and local transfer pricing regulations.
- Reduced exposure to costly disputes and financial penalties.
- Improved risk management frameworks for intercompany pricing.
- Increased confidence in documentation and audit preparedness.
- Better alignment with OECD and BEPS transfer pricing standards.
- Strengthened internal governance and control systems.
- More accurate and transparent intercompany pricing mechanisms.
- Improved communication with tax authorities and stakeholders.
- Efficient integration of technology in transfer pricing analysis.
- Strengthened reputation through proactive tax compliance practices.

Target Audiences

- Tax managers and transfer pricing professionals
- Finance and accounting executives

- Compliance and risk management officers
- Multinational enterprise (MNE) tax advisors
- Legal and regulatory consultants
- Government and revenue authority officials
- Internal and external auditors
- Financial analysts and corporate planners

Course Duration: 5 days

Course Modules

Module 1: Fundamentals of Transfer Pricing and Risk Concepts

- Overview of transfer pricing principles and methods
- Understanding associated risks and compliance challenges
- Identifying risk areas in intercompany transactions
- Global developments influencing transfer pricing risk
- Managing transfer pricing from a governance perspective
- Case Study: OECD guidelines and transfer pricing failures

Module 2: OECD, BEPS, and Global Transfer Pricing Frameworks

- OECD Transfer Pricing Guidelines and their evolution
- BEPS Actions 8–10 and 13: Key risk management implications
- Domestic implementation of global standards
- Understanding arm’s length principles and documentation
- Evaluating cross-border risk exposure in MNEs
- Case Study: BEPS implementation and tax compliance transformation

Module 3: Transfer Pricing Risk Assessment and Identification

- Identifying and categorizing transfer pricing risks
- Assessing materiality and exposure levels
- Benchmarking and comparability analysis
- Transactional risk mapping and scenario evaluation
- Using key performance indicators for risk monitoring
- Case Study: Risk profiling in multinational operations

Module 4: Documentation and Compliance Risk Mitigation

- Preparing Master Files, Local Files, and CbC Reports
- Documentation quality and audit defense preparation
- Strategies to ensure timely and accurate filings
- Leveraging automation in transfer pricing documentation
- Reducing documentation-related penalties and risks
- Case Study: Documentation lapses and audit adjustments

Module 5: Transfer Pricing Audits and Dispute Resolution

- Common audit triggers and authority risk models
- Managing tax authority inquiries and adjustments
- Negotiation and dispute resolution techniques
- Role of APA (Advance Pricing Agreements) in risk reduction
- Litigation vs. cooperative compliance approaches
- Case Study: Successful audit resolution through APA negotiation

Module 6: Data Analytics and Technology in Risk Management

- Application of big data in risk identification
- Predictive modeling for transaction analysis
- Leveraging ERP systems for compliance tracking
- AI tools in transfer pricing risk management
- Real-time data validation and continuous monitoring
- Case Study: Using analytics to mitigate transfer pricing risks

Module 7: Integrating Transfer Pricing into Enterprise Risk Management (ERM)

- Linking transfer pricing with overall corporate risk strategy
- Governance frameworks for MNEs
- Coordination between finance, tax, and compliance functions
- Setting risk appetite and control thresholds
- Monitoring and reporting mechanisms
- Case Study: Multinational ERM and tax risk alignment

Module 8: Strategic Transfer Pricing Risk Management Frameworks

- Designing proactive risk management frameworks
- Implementing control procedures and periodic reviews
- Engaging with tax authorities transparently
- Continuous improvement and compliance monitoring
- Measuring effectiveness of risk mitigation strategies
- Case Study: Building a sustainable transfer pricing risk program

Training Methodology

- Interactive expert-led lectures and discussions
- Practical exercises and compliance simulations
- Analysis of real-world case studies
- Group activities and peer-to-peer learning
- Use of data analytics and risk assessment tools
- Knowledge assessments and certification evaluation

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
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

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