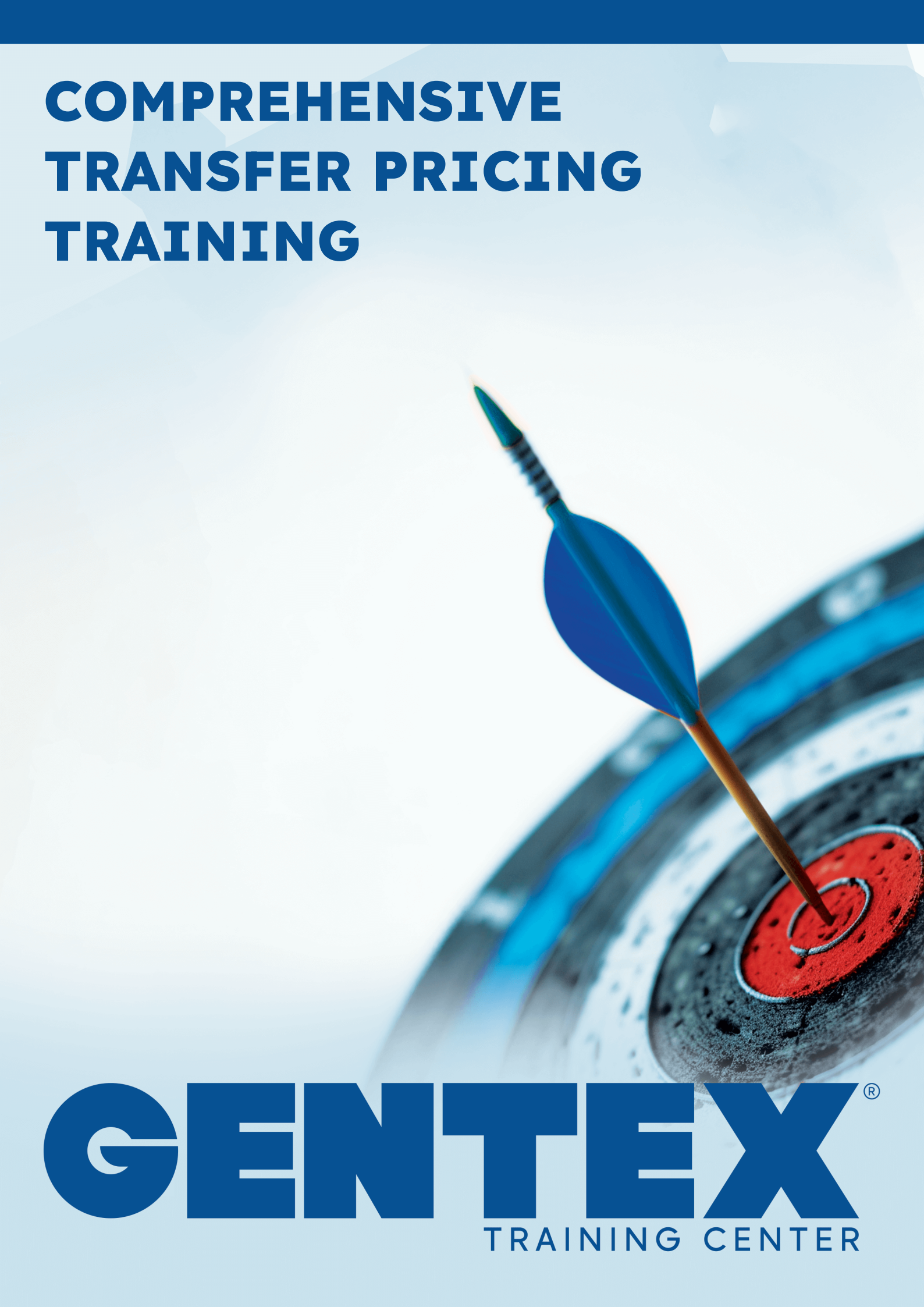
COMPREHENSIVE TRANSFER PRICING TRAINING



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TRAINING CENTER

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Introduction

Comprehensive Transfer Pricing Training Course builds the technical and documentation capability that tax, finance, and advisory professionals need to price intercompany transactions defensibly. Transfer pricing sits at the intersection of tax law, economics, and financial reporting, and it carries some of the largest adjustment risks in corporate taxation. Multinational groups face audit scrutiny on pricing, benchmarking, and documentation quality across every jurisdiction they operate in. This course develops the capability that withstands that scrutiny. It covers the arm's length principle, the OECD methods, and BEPS Action 13. Furthermore, it applies benchmarking, comparability analysis, and documentation design. In addition, it develops dispute resolution, advance pricing agreements, and audit defence. As a result, participants set and defend intercompany prices with confidence.

Comprehensive Transfer Pricing Training Course Objectives

- Explain the arm's length principle and its practical application.
- Apply the OECD transfer pricing methods to intercompany transactions.
- Conduct functional analysis and risk allocation reviews.
- Perform comparability analysis and economic benchmarking.
- Prepare Master File, Local File, and Country-by-Country reporting.
- Draft transfer pricing documentation that withstands audit.
- Apply intra-group services and cost contribution arrangements.
- Apply transfer pricing rules to intangibles and financial transactions.
- Recognise permanent establishment and profit attribution issues.
- Manage audits, dispute resolution, and advance pricing agreements.

Course Methodology

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- Interactive lectures with real transfer pricing and audit cases.
- Functional analysis and benchmarking workshops.
- Documentation drafting and comparability practice.
- Method selection and margin testing exercises.
- Structured peer review with facilitator feedback on documentation quality.

Who Should Take This Course

- Tax managers and transfer pricing specialists.
- Finance and accounting professionals in multinational groups.
- In-house tax counsel and compliance advisors.
- Auditors and tax authority examiners.
- Advisory and consulting professionals in transfer pricing.
- Treasury and intercompany accounting staff.

Comprehensive Transfer Pricing Training Course Outlines

Day 1: Transfer Pricing Foundations and the Arm's Length Principle

- Transfer pricing concepts and the arm's length principle.
- Article 9 of the OECD Model Tax Convention.
- OECD Transfer Pricing Guidelines structure and application.
- BEPS Action 8 to 10 and Action 13 overview.
- Domestic transfer pricing regimes and documentation thresholds.

- Permanent establishment and profit attribution basics.
- Case study: reviewing a transfer pricing position and its risk.

Day 2: Methods, Functional Analysis, and Comparability

- Comparable Uncontrolled Price method.
- Resale Price and Cost Plus methods.
- Transactional Net Margin Method application.
- Profit Split method and its use cases.
- Functional analysis, asset, and risk allocation.
- Comparability factors and adjustment considerations.
- Workshop: selecting a method and testing a margin range.

Day 3: Benchmarking and Documentation

- Benchmarking study design and search strategy.
- Database selection and screening criteria.
- Interquartile range and arm's length range determination.
- Master File and Local File content requirements.
- Country-by-Country Report preparation and filing.
- Documentation retention and update cycles.
- Workshop: drafting a Local File section with benchmarking support.

Day 4: Special Topics in Transfer Pricing

- Intra-group services and the benefit test.
- Cost contribution arrangements and contribution valuation.
- Intangibles: ownership, DEMPE functions, and hard-to-value intangibles.

- Financial transactions: loans, guarantees, and cash pooling.
- Commodity and commodity-linked transaction pricing.
- Business restructuring and exit charge considerations.
- Workshop: pricing an intangible and defending the allocation.

Day 5: Audit Defence, Disputes, and Compliance Management

- Risk assessment and transfer pricing risk registers.
- Audit preparation, evidence, and interview handling.
- Mutual Agreement Procedures and competent authority routes.
- Advance Pricing Agreements: types and application process.
- Penalties, adjustments, and voluntary correction options.
- Governance, policy, and internal control design.
- Course review, assessment, and action planning.

Conclusion

By successfully completing Comprehensive Transfer Pricing, participants will gain a thorough understanding of the arm's length principle, the OECD transfer pricing methods, functional and comparability analysis, benchmarking and documentation design, and audit defence, dispute resolution and compliance management. They will also acquire practical skills in transfer pricing method application, functional and comparability analysis, benchmarking and documentation, and audit defence and dispute resolution. In addition, the course prepares them to set intercompany prices with defensible support and clear documentation. Gentex Training Center delivers this programme with a strong focus on applied tax practice and audit-ready documentation.

LEARN BOLD. **LEAD BEYOND**
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FAQs for Comprehensive Transfer Pricing Training course

Q1 What is the "Comprehensive Transfer Pricing Training" course about?

It is a five-day programme on pricing intercompany transactions between related entities. It covers the arm's length principle, the OECD transfer pricing methods, functional and comparability analysis, benchmarking, transfer pricing documentation, special topics such as intangibles and financial transactions, and audit defence.

Q2 What are the key benefits of the "Comprehensive Transfer Pricing Training" course?

Participants set and defend intercompany prices with stronger support. The course improves method selection and margin testing, strengthens documentation quality and audit readiness, sharpens benchmarking and comparability work, reduces adjustment and penalty exposure, and improves dispute resolution and advance pricing agreement outcomes.

Q3 What skills will I gain from the "Comprehensive Transfer Pricing Training" course?

Participants gain transfer pricing method application, functional and comparability analysis, benchmarking and documentation, and audit defence and dispute resolution. These four skills cover the practical core of transfer pricing work.

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Q4 What tools, methods, or standards are covered in the "Comprehensive Transfer Pricing Training" course?

The course covers the arm's length principle, Article 9 of the OECD Model Tax Convention, the OECD Transfer Pricing Guidelines, BEPS Actions 8 to 10 and Action 13, domestic documentation thresholds, permanent establishment and profit attribution, the Comparable Uncontrolled Price, Resale Price, Cost Plus, Transactional Net Margin and Profit Split methods, functional analysis with asset and risk allocation, comparability factors, benchmarking study design, database selection and screening, interquartile range and arm's length range determination, Master File and Local File requirements, Country-by-Country reporting, documentation retention and update cycles, intra-group services and the benefit test, cost contribution arrangements, DEMPE analysis and hard-to-value intangibles, financial transactions including loans, guarantees and cash pooling, commodity pricing, business restructuring and exit charges, transfer pricing risk registers, audit preparation, Mutual Agreement Procedures, Advance Pricing Agreements, penalty and adjustment handling, and governance and internal control design.

Q5 How is the "Comprehensive Transfer Pricing Training" course applied in real-world practice?

Participants apply the methods to real intercompany transactions. They perform functional analysis, select pricing methods, benchmark margins, prepare Master File and Local File sections with Country-by-Country support, document intangibles and financial transactions, assess risk, build audit evidence, and prepare positions for competent authority or advance pricing agreement routes. Many leave with a benchmarking template, a documentation structure, and an audit defence pack ready to use.