

## Advanced Transfer Pricing

*Vienna (Austria)*

*25 - 29 November 2024*

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## Advanced Transfer Pricing

Code: FA28 From: 25 - 29 November 2024 City: Vienna (Austria) Fees: 4400 Pound

### Introduction

The Advanced Transfer Pricing Course is a comprehensive program designed to equip participants with in-depth knowledge and practical skills related to transfer pricing. This advanced-level course is tailored for professionals who already have a solid understanding of transfer pricing fundamentals and wish to explore the complex aspects of transfer pricing planning, documentation, and dispute resolution. Through a combination of theoretical discussions, case studies, and interactive exercises, participants will enhance their expertise in managing transfer pricing issues within multinational enterprises.

### Course Objectives

- Gain a deep understanding of advanced transfer pricing concepts, methodologies, and techniques.
- Develop the skills necessary to design and implement effective transfer pricing strategies.
- Acquire knowledge of transfer pricing documentation requirements and best practices.
- Understand the intricacies of transfer pricing compliance and risk management.
- Learn how to analyze and address transfer pricing disputes and controversies.
- Explore the latest trends and developments in international transfer pricing regulations.
- Apply practical tools and techniques to optimize transfer pricing outcomes within multinational enterprises.

### Course Outlines

#### Day 1: Advanced Transfer Pricing Concepts and Methodologies

- Review of transfer pricing fundamentals and the arm's length principle.
- Advanced transfer pricing methods: profit split method, transactional net margin method, and others.
- Comparability analysis: identifying and adjusting for differences between controlled and uncontrolled transactions.
- Addressing intangibles, cost-sharing arrangements, and intra-group services.

#### Day 2: Transfer Pricing Planning and Design

- Strategic considerations in transfer pricing.
- Creating and implementing effective transfer pricing policies.
- Advanced transfer pricing planning techniques.
- The relationship between transfer pricing and business restructurings.

#### Day 3: Transfer Pricing Documentation and Compliance

- Transfer pricing documentation requirements: master file, local file, and country-by-country reporting.
- Best practices for preparing and maintaining transfer pricing documentation.

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- Challenges in transfer pricing compliance and risk management strategies.
- Transfer pricing audits and expectations from tax authorities.

#### Day 4: Transfer Pricing Dispute Resolution

- Transfer pricing controversies and mechanisms for dispute resolution.
- Mutual agreement procedure MAP and advance pricing agreements APAs.
- Transfer pricing litigation and alternative dispute resolution methods.
- Managing transfer pricing disputes with tax authorities.

#### Day 5: Emerging Trends and Practical Applications

- The impact of BEPS Base Erosion and Profit Shifting on transfer pricing.
- Challenges of transfer pricing in the digital economy.
- Transfer pricing in specific industries or transactions.
- Practical case studies and group exercises to reinforce understanding.

#### Conclusion

By participating in the Advanced Transfer Pricing Course, attendees will explore the rules of transfer pricing and learn how to achieve the goals of effective transfer pricing policies. The knowledge gained will empower them to enhance their performance in the realm of transfer pricing, delivering significant benefits to their companies in the global context.



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