BLACKBIRD FOR TRAINING

Advanced Transfer Pricing

23 – 27 November 2026
Vienna (Austria)



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Introduction

Welcome to the Advanced Transfer Pricing Course, 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

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

- 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.
- 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.

Why Attend This Course: Wins & Losses!

- Advantages of mastering advanced transfer pricing: Understanding transfer pricing rules and the latest methods will enable you to effectively apply these concepts in your work.
- Enhance transfer pricing strategies: Learn how to implement transfer pricing policies and plan for transfer pricing to ensure compliance and achieve optimal financial results.
- Stay up-to-date with global transfer pricing regulations: Explore international transfer pricing and understand the impact of international regulations on your transfer pricing policies.
- Resolve transfer pricing disputes effectively: Learn how to manage transfer pricing disputes and use tools like advance pricing agreements APA to navigate controversies.
- Achieve compliance and improve performance: You'll be equipped to enhance compliance strategies for transfer pricing and provide accurate reporting, contributing to improved financial performance in your organization.



Conclusion

By participating in the Advanced Transfer Pricing Course, attendees will gain in-depth knowledge about advanced transfer pricing concepts and transfer pricing methods. This course will help you improve your professional performance and provide significant benefits to your company in a global context. Whether you are looking to design transfer pricing strategies, improve your transfer pricing documentation, or understand international transfer pricing regulations, this course is the perfect opportunity for you.

Join now to earn your advanced transfer pricing certification and start applying the skills and knowledge that will drive success in global transfer pricing.

