

Advanced Transfer Pricing

Munich (Germany)

23 - 27 December 2024

UK Training

PARTNER



Advanced Transfer Pricing

Code: FA28 From: 23 - 27 December 2024 City: Munich (Germany) Fees: 4700 Pound

Introduction

The Advanced Transfer Pricing Course is a comprehensive program designed to provide participants with in-depth knowledge and practical skills related to transfer pricing. This advanced-level course is tailored for professionals who already possess a solid understanding of transfer pricing fundamentals and wish to delve deeper into 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.

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 Outline

Day 1

Advanced Transfer Pricing Concepts and Methodologies

- Review of transfer pricing fundamentals and 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 transfer pricing considerations.
- Creating and implementing effective transfer pricing policies.
- Advanced transfer pricing planning techniques.
- Transfer pricing and business restructurings.

Day 3

UK Training

PARTNER



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.
- Transfer pricing compliance challenges and risk management strategies.
- Transfer pricing audits and tax authority expectations.

Day 4

Transfer Pricing Dispute Resolution

- Transfer pricing controversies and dispute resolution mechanisms.
- 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

- BEPS Base Erosion and Profit Shifting and its impact on transfer pricing.
- Digital economy and transfer pricing challenges.
- Transfer pricing in specific industries or transactions.
- Practical case studies and group exercises.

Blackbird Training Cities

Europe



Podgorica (Montenegro)



Stockholm (Sweden)



Lyon (France)



Birmingham (UK)



Copenhagen (Denmark)



Bordeaux (France)



Annecy (France)



Oslo (Norway)



Edinburgh (UK)



Glasgow (Scotland)



Sarajevo (Bosnia and Herzegovina)



Málaga (Spain)



London (UK)



Istanbul (Turkey)



Amsterdam (Netherlands)



Düsseldorf (Germany)



Paris (France)



Barcelona (Spain)



Munich (Germany)



Geneva (Switzerland)



Prague (Czech)



Vienna (Austria)



Rome (Italy)



Brussels (Belgium)



Madrid (Spain)



Berlin (Germany)



Lisbon (Portugal)



Zurich (Switzerland)



Manchester (UK)



Milan (Italy)

USA & Canada



Los Angeles (USA)



Florida (USA)



Online



Boston (USA)



Washington (USA)



Miami (USA)



New York (USA)



Malta (Malta)



Toronto (Canada)



Blackbird Training Cities

Asia



Baku (Azerbaijan)



Maldives (Maldives)



Manila (Philippines)



Bali (Indonesia)



Bangkok (Thailand)



Beijing (China)



Moscow (Russia)
(Malaysia)



Singapore (Singapore)



Sydney (Australia)



Tokyo (Japan)



Dubai (UAE)



Kuala Lumpur



Jakarta (Indonesia)

Africa



Kigali (Rwanda)



Cape Town (South Africa)



Accra (Ghana)



Lagos (Nigeria)



Marrakesh (Marocco)



Nairobi (Kenya)



Cairo (Egypt)



Sharm El-Sheikh (Egypt)



Casablanca (Morocco)



Tunis (Tunisia)



Blackbird Training Clients



UK Training
PARTNER

Blackbird Training Categories

Management & Admin

Agile
Professional Skills
Finance, Accounting, Budgeting
Media & Public Relations
Project Management
Human Resources
Audit & Quality Assurance
Marketing, Sales, Customer Service
Secretary & Admin
Supply Chain & Logistics
Management & Leadership
Agile and Refinement

Technical Courses

Hospital Management
Public Sector
Special Workshops
Oil & Gas Engineering
Telecom Engineering
IT & IT Engineering
Health & Safety
Law and Contract Management
Customs & Safety
Aviation
C-Suite Training



BLACKBIRD
FOR TRAINING

 International House 185 Tower Bridge
Road London SE1 2UF United Kingdom

 +44 7401 1773 35
+44 7480 775526

 Sales@blackbird-training.com

 www.blackbird-training.com

UK Training
PARTNER

