BLACKBIRD FOR TRAINING

# Advanced Transfer Pricing

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Sharm El-Sheikh (Egypt)

UK Traininig
PARTNER



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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.**

