Advanced Transfer Pricing

Cape Town (South Africa)

6 - 10 January 2025

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Advanced Transfer Pricing

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

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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.

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