

## Fundamentals of Transfer Pricing

*Malaga (Spain)*

*10 - 14 March 2025*

UK Training

# PARTNER



# Fundamentals of Transfer Pricing

Code: CS28 From: 10 - 14 March 2025 City: Malaga (Spain) Fees: 4700 Pound

## Introduction

This course co-developed with the OECD aims to explain the stakes and problems of transfer pricing on both tax and customs points of view. This course was updated in 2015 thanks to the financial support of the Ministry of Strategy and Finance.

## Course Objectives of Transfer Pricing

- Separate Entity Approach
- Stakes for the MNE
- Customs Duty
- Model Tax Convention
- Associated Enterprises
- Administrative and Practical Aspects
- Procedural Aspects
- Transfer Pricing Methods
- Traditional Transaction Methods and Transactional Profit Methods
- Comparable Uncontrolled Price
- Resale Price Method
- Cost Plus Method
- Transactional Net Margin Method
- Profit Split Method

## Course outlines - Transfer Pricing

### Day 1

#### Introduction to Transfer Pricing

- What is transfer pricing?
- Why is it important?

#### The Legal Framework

- The international tax environment
- The arm's length principle
- Domestic transfer pricing rules
- The role of tax treaties
- The OECD Transfer Pricing Guidelines

## Day 2

### Comparability

- The Arm's Length Principle and Comparability
- Comparability Factors
- Comparability Adjustments

## Day 3

### Transfer pricing methods

- CUP method
- Resale price method
- Cost plus method
- Transaction net margin method
- Profit split method Other methods

## Day 4

### Transfer pricing adjustments

- Compensating adjustments
- Primary adjustments
- Corresponding adjustments
- Secondary adjustments
- Repatriation

## Day 5

### Transfer Pricing dispute avoidance and resolution

- Advance Pricing Agreement s
- Domestic mechanisms
- Mutual Agreement Procedure
- Arbitration Art. 255 OECD MTC
- European Arbitration Convention





# Blackbird Training Cities

## Europe



Zurich (Switzerland )



Stockholm (Sweden)



Lyon (France)



Copenhagen (Denmark)



Bordeaux (France)



Annecy (France)



Oslo (Norway)



Edinburgh (UK)



Glasgow (Scotland )



Malaga (Spain)



London (UK)



Istanbul (Turkey)



Amsterdam (Netherlands)  
(Switzerland)



Düsseldorf (Germany)



Paris (France)



Barcelona (Spain)



Munich (Germany)



Geneva



Prague (Czech)



Vienna (Austria)



Rome (Italy)



Brussels (Belgium)



Madrid (Spain)



Berlin (Germany)



Lisbon (Portugal)



Manchester (UK)



Milan (Italy)

## USA & Canada



Los Angeles (USA)



Florida (USA)



Online



Boston (USA)



Washington (USA)



Miami(USA)



New York (USA)



Toronto (Canada)



## Blackbird Training Cities

### Asia



Baku (Azerbaijan)



Maldives (Maldives)



Manila (Philippines)



Bali (Indonesia )



Bangkok (Tailand)



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

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



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



+44 7401 1773 35  
+44 7480 775526



[training@blackbird-training.com](mailto:training@blackbird-training.com)



[www.blackbird-training.com](http://www.blackbird-training.com)

UK Training

**PARTNER**

