

Fundamentals of Transfer Pricing

Cape Town (South Africa)

15 - 19 December 2025

UK Traininig

PARTNER



Fundamentals of Transfer Pricing

Code: CS28 From: 15 - 19 December 2025 City: Cape Town (South Africa) Fees: 4000 Pound

Introduction

This course, co-developed with the OECD, offers an in-depth exploration of transfer pricing from both tax and customs perspectives. Updated in 2015 with financial support from the Ministry of Strategy and Finance, this training is designed for professionals in international trade, focusing on the application of rules of origin and transfer pricing regulations. It highlights the intersection of trade agreements and customs duties as they relate to transfer pricing and provides practical insights into navigating the complexities of international taxation and customs regulations.

Course Objectives

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

- Understand the importance of rules of origin in international trade and their role in transfer pricing.
- Apply the arm's length principle to determine transfer pricing in transactions between related entities.
- Gain knowledge of various transfer pricing methods and their application in compliance with international trade agreements.
- Understand customs duties and the impact of tax treaties on international pricing practices.
- Master the procedural aspects of transfer pricing, including documentation and dispute resolution mechanisms such as advance pricing agreements APAs and mutual agreement procedures.

Course Outlines

Day 1: Introduction to Transfer Pricing

- What is Transfer Pricing?
 - Understand the transfer pricing definition, its significance in international trade, and its impact on customs duties and tax compliance.
- The Legal Framework
 - Overview of the international tax environment and the role of tax treaties.
 - Explanation of the arm's length principle and how it applies to rules of origin in international trade.
 - Review of OECD transfer pricing guidelines and their role in global taxation.

Day 2: Comparability and the Arm's Length Principle

- Comparability
 - In-depth analysis of the arm's length principle and how it relates to rules of origin.
 - Learn how to assess comparability in cross-border transactions.
- Factors of Comparability
 - Comparability adjustments in determining rules of origin and how they affect customs duties and tax

PARTNER



calculations.

Day 3: Transfer Pricing Methods

- CUP Method Comparable Uncontrolled Price
 - How this method impacts transfer pricing and customs duties.
- Resale Price Method
 - Application of this method in international trade for determining transfer pricing.
- Cost Plus Method
 - Practical usage of the cost plus method in calculating customs duties and ensuring compliance with rules of origin.
- Transactional Net Margin Method TNMM
 - How to apply the TNMM for evaluating transfer pricing in line with international trade agreements.
- Profit Split Method
 - Understanding when to use the profit split method in associated enterprises.

Day 4: Transfer Pricing Adjustments

- Compensating Adjustments
 - How to handle primary and secondary adjustments to align with rules of origin and tax laws.
- Repatriation
 - Learn the procedures for repatriating profits in accordance with transfer pricing regulations.

Day 5: Transfer Pricing Dispute Avoidance and Resolution

- Advance Pricing Agreements APAs
 - Procedures for negotiating and implementing APAs and their role in avoiding disputes.
- Domestic Mechanisms and Mutual Agreement Procedure MAP
 - Understand the dispute resolution process through MAP and the role of tax treaties.
- Arbitration Art. 255 OECD MTC



- The role of arbitration in resolving transfer pricing disputes in international trade.
- European Arbitration Convention
 - Overview of how the European Arbitration Convention aids in dispute resolution in transfer pricing.

Why Attend This Course: Wins & Losses!

- Gain a comprehensive understanding of transfer pricing and its critical role in customs duties and international trade.
- Master the rules of origin in the context of transfer pricing, ensuring compliance with tax laws and customs regulations.
- Learn practical techniques for applying transfer pricing methods like CUP, resale price, cost plus, and others in real-world scenarios.
- Develop the ability to navigate complex tax treaties and international trade agreements, reducing risk and increasing compliance.
- Enhance your understanding of dispute avoidance mechanisms, including APAs, MAP, and arbitration, ensuring smooth international trade operations.

Conclusion

This course provides a deep dive into transfer pricing and its intersection with rules of origin, customs duties, and international trade agreements. By mastering transfer pricing methods and understanding the intricacies of tax treaties, customs procedures, and dispute resolution mechanisms, participants will be equipped to handle complex trade and tax challenges. Whether you are a professional in international trade, taxation, or customs operations, this course will enhance your ability to ensure compliance, minimize risks, and optimize cross-border transactions.



Blackbird Training Cities

Europe



Malaga (Spain)



Sarajevo (Bosnia and Herzegovina)



Oporto (Portugal)



Glasgow (Scotland)



Edinburgh (UK)



Oslo (Norway)



Annecy (France)



Bordeaux (France)



Copenhagen (Denmark)



Birmingham (UK)



Lyon (France)



Moscow (Russia)



Stockholm (Sweden)



Podgorica (Montenegro)



Batumi (Georgia)



Salzburg (Austria)



London (UK)



Istanbul (Turkey)



Amsterdam



Düsseldorf (Germany)



Paris (France)



Athens (Greece)



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)



Blackbird Training Cities

USA & Canada



Los Angeles (USA)



Orlando, Florida (USA)



Online



Phoenix, Arizona (USA)



Houston, Texas (USA)



Boston, MA (USA)



Washington (USA)



Miami, Florida (USA)



New York City (USA)



Seattle, Washington (USA)



Washington DC (USA)



In House



Jersey, New Jersey (USA)



Toronto (Canada)

ASIA



Baku (Azerbaijan)
(Thailand)



Maldives (Maldives)



Doha (Qatar)



Manila (Philippines)



Bali (Indonesia)



Bangkok



Beijing (China)



Singapore (Singapore)



Sydney



Tokyo (Japan)



Jeddah (KSA)



Riyadh (KSA)



Melbourne (Australia)
Korea



Phuket (Thailand)



Dubai (UAE)



Kuala Lumpur (Malaysia)



Kuwait City (Kuwait)



Seoul (South)



Pulau Ujong (Singapore)



Irbid (Jordan)



Jakarta (Indonesia)



Amman (Jordan)



Beirut



Blackbird Training Cities

AFRICA



Kigali (Rwanda)



Cape Town (South Africa)



Accra (Ghana)



Lagos (Nigeria)



Marrakesh (Morocco)



Nairobi (Kenya)



Zanzibar (Tanzania)



Tangier (Morocco)



Cairo (Egypt)



Sharm El-Sheikh (Egypt)



Casablanca (Morocco)



Tunis (Tunisia)



Blackbird Training Clients



MANNAI Trading
Company WLL,
Qatar



Alumina Corporation
Guinea



Booking.com
Netherlands



Oxfam GB International
Organization,
Yemen



Capital Markets
Authority,
Kuwait



Waltersmith Petroman Oil Limited
Nigeria



Qatar National Bank
(QNB),
Qatar



Qatar Foundation,
Qatar



AFRICAN UNION ADVISORY
BOARD ON CORRUPTION,
Tanzania



KFAS
Kuwait



Reserve Bank of
Malawi,
Malawi



Central Bank of Nigeria
Nigeria



Ministry of Interior,
KSA



Mabruk Oil Company
Libya



Saudi Electricity
Company,
KSA



BADAN PENGELOLA
KEUANGAN Haji,
Indonesia



NATO
Italy



ENI CORPORATE
UNIVERSITY,
Italy



Gulf Bank
Kuwait



General Organization for
Social Insurance
KSA



Defence Space Administration
Nigeria



National Industries
Group (Holding),
Kuwait



Hamad Medical
Corporation,
Qatar



USAID
Pakistan



STC Solutions,
KSA



North Oil company,



EKO Electricity



Oman Broadband



UNITED NATIONS
UN.



Authority for

UK Training
PARTNER



Blackbird Training Categories

Management & Admin

Entertainment & Leisure
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 Elevation

Technical Courses

Artificial Intelligence (AI)
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

 Sales@blackbird-training.com

 www.blackbird-training.com

