

Advanced Transfer Pricing Benchmarking

Dubai (UAE)

4 - 8 August 2024

UK Training

PARTNER



Advanced Transfer Pricing Benchmarking

Code: FA28 From: 4 - 8 August 2024 City: Dubai (UAE) Fees: 3900 Pound

Introduction

The Advanced Transfer Pricing Benchmarking course is an advanced program designed to provide professionals with the latest knowledge and skills in benchmarking for transfer pricing purposes. This course offers comprehensive insights into benchmarking methodologies, techniques, and best practices, focusing on both transaction-level benchmarking and the whole-entity approach. Participants will gain a deep understanding of the modern approaches to transfer pricing benchmarking and learn how to effectively apply them in practice.

Objectives

- **Understand the Significance of Benchmarking in Transfer Pricing:** Explore the importance of benchmarking in transfer pricing and its role in ensuring arm's length pricing for intercompany transactions.
- **Master Transfer Pricing Methodologies:** Gain a comprehensive understanding of various transfer pricing methodologies, including transactional net margin method TNMM, comparable uncontrolled price CUP method, and profit split method, among others.
- **Learn Advanced Benchmarking Techniques:** Acquire advanced benchmarking techniques, such as functional analysis, comparability adjustments, and selecting the most appropriate comparables for accurate benchmarking analysis.
- **Explore Transaction-Level Benchmarking:** Understand the intricacies of conducting transaction-level benchmarking, considering specific transaction types, industry characteristics, and available databases.
- **Implement the Whole Entity Approach:** Learn about the whole entity approach in transfer pricing, which involves analyzing the overall profitability and value chain of the entire entity for benchmarking purposes.
- **Stay Updated on the Latest Transfer Pricing Guidelines:** Familiarize yourself with the most recent transfer pricing guidelines, regulations, and documentation requirements from relevant tax authorities and international bodies.
- **Mitigate Transfer Pricing Risks:** Identify and address transfer pricing risks by effectively utilizing benchmarking analysis and aligning intercompany pricing with arm's length principles.
- **Develop Effective Transfer Pricing Documentation:** Understand the key components of transfer pricing documentation and learn how to prepare comprehensive and defensible documentation using benchmarking analysis.
- **Handle Disputes and Audits:** Gain insights into transfer pricing dispute resolution mechanisms, including competent authority procedures, advance pricing agreements APAs, and managing transfer pricing audits.
- **Apply Best Practices and Emerging Trends:** Explore best practices in transfer pricing benchmarking and stay updated on emerging trends, such as digitalization, the impact of BEPS Base Erosion and Profit Shifting, and the evolving global transfer pricing landscape.

Course Outline

Day 1

Introduction to Transfer Pricing and Benchmarking

- Overview of transfer pricing concepts and regulations
- Importance of benchmarking in transfer pricing
- Overview of transfer pricing methods

Day 2

Transaction-Level Benchmarking

- Understanding the transactional net margin method TNMM
- Selection and analysis of comparable companies and transactions
- Functional analysis and comparability adjustments

Day 3

Whole Entity Approach in Benchmarking

- Introduction to the whole entity approach
- Analyzing the value chain and overall profitability of the entity
- Integrating transaction-level benchmarking with the whole entity approach

Day 4

Transfer Pricing Documentation and Risk Mitigation

- Transfer pricing documentation requirements and best practices
- Managing transfer pricing risks through benchmarking analysis
- Addressing specific transfer pricing challenges and issues

Day 5

Dispute Resolution and Emerging Trends

- Transfer pricing dispute resolution mechanisms
- Advance pricing agreements APAs and competent authority procedures
- Emerging trends and future developments in transfer pricing benchmarking

A graphic of a chessboard with several chess pieces (a king, a queen, a rook, and a knight) on it, set against a background of concentric circles. The text 'UK Training PARTNER' is overlaid on the right side of the board.

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