BLACKBIRD FOR TRAINING

Advanced Transfer Pricing Benchmarking

14 – 18 December 2026
Munich (Germany)



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Introduction

In today's global economy, transfer pricing has become a critical focus area for multinational companies and tax authorities. Properly structured transfer pricing policies are essential for ensuring compliance with global transfer pricing regulations, avoiding disputes, and mitigating financial risks.

The Advanced Transfer Pricing Benchmarking course is a specialized training program designed to equip professionals with the knowledge and skills necessary to master transfer pricing methodologies, apply benchmark pricing strategies, and align intercompany transactions with arm's length standards. Through in-depth exploration of benchmark pricing and transfer pricing agreements, participants will gain the confidence to handle audits, document transactions, and address emerging challenges in the evolving regulatory landscape.

Course Objectives

- Understand the fundamentals of transfer pricing: Learn what transfer pricing is, its significance, and the principles behind it.
- Master advanced transfer pricing methodologies: Dive into techniques like the transactional net margin method TNMM and the comparable uncontrolled price CUP method.
- Apply benchmark pricing strategies: Develop proficiency in using benchmark pricing and comparability adjustments for accurate pricing strategies.
- Explore transaction-level and whole-entity approaches: Understand how to integrate transactional benchmarking with holistic profitability analysis.
- Enhance documentation practices: Gain insights into transfer pricing documentation requirements and best practices for creating defensible reports.
- Mitigate risks and manage audits: Learn to identify potential risks and handle audits of transfer pricing effectively.
- Address emerging trends in global transfer pricing: Stay updated on transfer pricing policies, BEPS initiatives, and digital transformations impacting the field.



Course Outlines

Day 1: Introduction to Transfer Pricing and Benchmarking

- What is Transfer Pricing? Understanding the concept, definition, and meaning of transfer pricing.
- Importance of benchmark pricing in achieving arm's length standards.
- Overview of transfer pricing methods and their practical applications.
- Role of global transfer pricing regulations in shaping policies and compliance.

Day 2: Transaction-Level Benchmarking

- Introduction to transaction-level benchmarking and the TNMM method.
- Selection of comparable companies and transactions for benchmark pricing.
- Conducting functional analysis and making comparability adjustments for accurate results.
- Addressing challenges in transaction-specific benchmarking scenarios.

Day 3: Whole Entity Approach in Benchmarking

- Understanding the whole-entity approach and its significance in transfer pricing strategy.
- Conducting value chain analysis to evaluate overall profitability.
- Integrating transaction-level and whole-entity analyses for comprehensive insights.
- Case studies on applying benchmark pricing strategies at the entity level.

Day 4: Documentation and Risk Mitigation

- Key components of transfer pricing documentation: Local files, master files, and country-by-country reporting.
- Best practices for mitigating risks through thorough benchmarking analysis.
- Strategies for addressing transfer pricing policy challenges and compliance risks.
- Preparing for the audit of transfer pricing: Handling tax authority inquiries and audits.

Day 5: Dispute Resolution and Emerging Trends

- Overview of transfer pricing dispute resolution mechanisms, including arbitration and mediation.
- Role of advance pricing agreements APAs in reducing uncertainty.
- Exploring future trends in global transfer pricing, such as BEPS initiatives and digital transformation.
- Best practices for staying ahead of evolving transfer pricing policies and regulations.



Why Attend this Course? Wins & Losses!

- Enhanced Expertise: Gain comprehensive knowledge of transfer pricing methodologies and benchmarking strategies.
- Practical Skills: Learn to apply advanced techniques to create defensible transfer pricing documentation.
- Risk Mitigation: Master strategies to identify and address potential compliance risks in intercompany transactions.
- Future-Ready: Stay informed about emerging trends and prepare for upcoming regulatory challenges.

Conclusion

By the end of the Advanced Transfer Pricing Benchmarking Course, participants will have developed the expertise needed to confidently manage complex transfer pricing challenges, implement robust benchmark pricing strategies, and comply with evolving global regulations. Whether you're navigating the intricacies of transfer pricing policies or aiming to optimize your organization's tax strategy, this course provides the tools and insights to excel.

With the skills gained, you'll not only enhance your ability to handle transfer pricing audits, but also position your organization for sustainable success in a globalized market. Join this course to master transfer pricing services and ensure that your intercompany transactions align seamlessly with arm's length standards.

