

## Advanced Transfer Pricing Benchmarking

*Tokyo (Japan)*

*29 September - 3 October 2025*

UK Training

**PARTNER**



## Advanced Transfer Pricing Benchmarking

Code: FA28 From: 29 September - 3 October 2025 City: Tokyo (Japan) Fees: 4700 Pound

### Introduction

The Advanced Transfer Pricing Benchmarking course is an essential and advanced training program designed to provide professionals with an in-depth understanding of benchmarking for transfer pricing. This course emphasizes the latest methodologies, techniques, and best practices related to transfer pricing, including both transaction-level benchmarking and the whole-entity approach. Participants will acquire the necessary knowledge and skills to apply these advanced techniques effectively and strategically in their work, ensuring compliance with global transfer pricing regulations.

### Course Objectives

- Understand the significance of benchmarking in transfer pricing: Explore the role of benchmarking in transfer pricing and its importance in achieving arm's length pricing for intercompany transactions.
- Master transfer pricing methodologies: Gain a comprehensive understanding of key transfer pricing methods, such as the transactional net margin method TNMM, comparable uncontrolled price CUP method, and profit split method.
- Learn advanced benchmarking techniques: Acquire techniques such as functional analysis, comparability adjustments, and selecting appropriate comparables for precise benchmark pricing.
- Explore transaction-level benchmarking: Understand the complexities involved in transaction-level benchmarking and analyze the implications of specific transaction types and industry characteristics.
- Implement the whole entity approach: Learn to conduct a whole-entity analysis, which evaluates the overall profitability and value chain for benchmarking purposes.
- Stay updated on transfer pricing regulations: Familiarize yourself with the latest global transfer pricing guidelines, policies, and documentation requirements set by tax authorities and international bodies.
- Mitigate transfer pricing risks: Identify potential transfer pricing risks and learn to address them through effective benchmarking analysis to align pricing strategies with arm's length standards.
- Develop comprehensive transfer pricing documentation: Understand the essential elements of transfer pricing documentation and learn to produce thorough and defensible documentation using benchmarking data.
- Handle audits and disputes: Gain insights into managing audits and disputes through competent authority procedures, advance pricing agreements APAs, and dispute resolution strategies.
- Apply best practices and understand emerging trends: Stay informed on best practices and emerging trends in transfer pricing benchmarking, including digitalization, BEPS Base Erosion and Profit Shifting, and evolving global policies.

### Course Outlines

#### Day 1: Introduction to Transfer Pricing and Benchmarking

- Overview of transfer pricing concepts and regulations: Define transfer pricing and its significance in the

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context of global finance.

- Importance of benchmarking in transfer pricing: Understand how benchmark pricing strategies help align intercompany pricing with arm's length principles.
- Overview of transfer pricing methods: Learn the different transfer pricing strategies and their applications.

## Day 2: Transaction-Level Benchmarking

- Understanding the transactional net margin method TNMM: Explore the methodologies involved in transaction-level benchmarking.
- Selection and analysis of comparable companies and transactions: Learn how to choose the most appropriate comparables for accurate benchmark pricing.
- Functional analysis and comparability adjustments: Master techniques of functional analysis and making necessary adjustments for comparability.

## Day 3: Whole Entity Approach in Benchmarking

- Introduction to the whole entity approach: Understand this holistic methodology for benchmarking and its significance.
- Analyzing the value chain and overall profitability of the entity: Dive deep into assessing the entire value chain for benchmarking.
- Integrating transaction-level benchmarking with the whole entity approach: Combine these approaches for comprehensive benchmarking analysis.

## Day 4: Transfer Pricing Documentation and Risk Mitigation

- Transfer pricing documentation requirements and best practices: Explore the key elements and strategies for effective documentation.
- Managing transfer pricing risks through benchmarking analysis: Learn to identify and mitigate risks using advanced techniques.
- Addressing specific transfer pricing challenges and issues: Understand and resolve common transfer pricing issues.

## Day 5: Dispute Resolution and Emerging Trends

- Transfer pricing dispute resolution mechanisms: Gain insights into strategies and policies for handling transfer pricing disputes.
- Advance pricing agreements APAs and competent authority procedures: Learn the benefits and processes involved in these transfer pricing agreements.
- Emerging trends and future developments in transfer pricing benchmarking: Stay ahead by understanding how global policies and digitalization are reshaping transfer pricing methodologies.

## Conclusion

By the end of the Advanced Transfer Pricing Benchmarking course, participants will be proficient in applying advanced transfer pricing techniques and methodologies, ensuring that their strategies align with global transfer pricing regulations. This course will provide participants with a well-rounded understanding of benchmark pricing strategies and policies and prepare them to handle audits, disputes, and future trends in the transfer pricing landscape. The knowledge gained will enhance their ability to produce high-quality, defensible transfer pricing documentation and help mitigate risks, supporting strategic decision-making in international finance.

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