

Financial Transactions ■ Benchmarking for Transfer Pricing Analysis

London (UK)

12 - 16 January 2026

UK Training

PARTNER



Financial Transactions – Benchmarking for Transfer Pricing Analysis

Code: FA28 From: 12 - 16 January 2026 City: London (UK) Fees: 4400 Pound

Introduction

As global tax scrutiny intensifies, financial transactions between related parties are receiving increased attention from tax authorities worldwide. Ensuring that such transactions—whether loans, bonds, debentures, preference shares, or guarantees—are priced at arm's length is now a regulatory imperative.

This comprehensive course equips participants with a deep understanding of transfer pricing for financial transactions, aligning with OECD Guidelines and local tax laws. Designed for tax executives, financial controllers, transfer pricing specialists, and compliance officers across diverse sectors—such as oil & gas, banking, telecommunications, government, and more—the course provides a strategic blend of theoretical principles and practical applications.

Whether you're developing defensible documentation or conducting benchmarking analysis, this training will empower you to enhance compliance, minimize audit risks, and apply industry-standard methodologies confidently.

Course Objectives

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

- Understand the transfer pricing framework related to intra-group financial transactions.
- Identify and evaluate a range of financial instruments such as intercompany loans, bonds, and guarantees.
- Apply advanced benchmarking techniques to determine arm's length pricing.
- Conduct functional and risk analysis for financial transactions within multinational groups.
- Prepare robust transfer pricing documentation aligned with OECD and local standards.
- Leverage industry tools and databases e.g., Bloomberg, Refinitiv for comparables analysis.
- Distinguish between legal form and economic substance in transaction structuring.
- Navigate regulatory environments including thin capitalization and safe harbor rules.

Course Outlines

Day 1: Fundamentals of Transfer Pricing and Financial Transactions

- Introduction to core Transfer Pricing principles and OECD Chapter X.
- Types and structures of intra-group financial transactions.
- Conducting functional analysis: roles of lender vs. borrower.
- Distinguishing between legal form vs. economic substance.
- Introduction to benchmarking and the concept of comparability.

Day 2: Intercompany Loans - Interest Benchmarking

- Understanding intercompany loan structures: tenure, collateral, currency, repayment terms.
- Determining arm's length interest rates: CUP method, credit ratings, and risk adjustments.

The logo for UK Training Partner, featuring the text 'UK Training' in a small font above the word 'PARTNER' in a large, bold, black font. The background of the logo is a chessboard with several chess pieces (a king, a queen, a rook, and a pawn) in gold and silver.

- Use of internal and external comparables in practice.
- Tools and databases: Bloomberg, Refinitiv, LoanConnector.
- Implications of thin capitalization rules and safe harbors in local jurisdictions.

Day 3: Bonds, Debentures, and Preference Shares

- Characteristics of intra-group bonds and debentures.
- Benchmarking coupon rates for preference shares.
- Using yield curve analysis and interest rate spreads for pricing.
- Treatment of hybrid instruments under TP frameworks.
- Case Study: Pricing and benchmarking a debenture issued between related parties.

Day 4: Corporate and Performance Guarantees

- Differentiating corporate guarantees vs. performance guarantees.
- Performing functional and risk analysis for guarantees.
- Methods to benchmark guarantee fees: yield approach, cost approach, CUP.
- Data sources for finding comparable guarantee pricing.
- Case Study: Determining the arm's length fee for a corporate guarantee.

Day 5: Documentation, Compliance, and Case Simulation

- Drafting transfer pricing documentation for financial transactions.
- Managing audit risks and defending TP positions with confidence.
- Understanding Advance Pricing Agreements APA and dispute resolution options.
- Group Exercise: Complete TP analysis for a multi-instrument transaction loan + bond + guarantee.
- Final wrap-up: Q&A, key takeaways, and compliance insights.

Why Attend this Course: Wins & Losses!

- Gain in-demand expertise in pricing financial transactions within multinational groups.
- Master benchmarking methods using actual market data and databases.
- Enhance your skills in preparing OECD-compliant documentation.
- Learn to proactively mitigate audit risk and respond to regulatory challenges.
- Understand how to handle complex hybrid financial instruments.
- Build confidence in dealing with cross-border tax issues related to finance.
- Position your organization for global tax compliance success.
- Network with professionals and experts in transfer pricing and tax governance.

Conclusion

In today's compliance-driven environment, mastering the art and science of transfer pricing for financial transactions is no longer optional—it's a necessity. This course empowers professionals with the tools, methodologies, and insights required to navigate the complexities of arm's length pricing, functional risk analysis, and documentation for financial instruments.

Through hands-on practice, real-world case studies, and access to global benchmarks, you'll be well-prepared to support your organization's strategic objectives and tax integrity. Whether you're responsible for intercompany

UK Training

PARTNER





funding, guarantees, or hybrid financing, this training positions you as a trusted expert in your field.

UK Training
PARTNER

Head Office: +44 7480 775 526
Email: Sales@blackbird-training.com
Website: www.blackbird-training.com



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)



London (UK)



Istanbul (Turkey)



Amsterdam



Düsseldorf (Germany)
(Switzerland)



Paris (France)



Athens (Greece)



Barcelona (Spain)



Munich (Germany)



Geneva



Prague (Czech)



Vienna (Austria)



Rome (Italy)



Brussels



Madrid (Spain)



Berlin (Germany)



Lisbon (Portugal)



Zurich



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

UK Training
PARTNER

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 CORPORATION MANNAI Trading Company WLL, Qatar	 GAC UNE FILIALE D' EGA Alumina Corporation Guinea	 Booking.com Booking.com Netherlands	 OXFAM Oxfam GB International Organization, Yemen	 Capital Markets Authority Kuwait
 Waltersmith Waltersmith Petroman Oil Limited Nigeria	 QNB Qatar National Bank (QNB), Qatar	 Qatar Foundation Qatar	 AFRICAN UNION ADVISORY BOARD ON CORRUPTION Tanzania	 KFAS KFAS Kuwait
 Reserve Bank of Malawi Malawi	 Central Bank of Nigeria Nigeria	 Ministry of Interior Kingdom of Saudi Arabia KSA	 Mabruk Oil Company Libya	 Saudi Electricity Company KSA
 BPKH Badan Pengelola Keuangan Haji BADAN PENGELOLA KEUANGAN Haji, Indonesia	 NATO Italy Italy	 ENI ENI CORPORATE UNIVERSITY, Italy	 GULF BANK 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 STC Solutions, KSA
 North Oil Company North Oil company,	 EKO Electricity EKO Electricity	 OMAN BROADBAND Oman Broadband	 UNITED NATIONS UN.	 Authority for Electricity Regulation, Oman 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

UK Training
PARTNER

