

# Financial Transactions ▯ Benchmarking for Transfer Pricing Analysis

*Amsterdam*

*29 September - 3 October 2025*

UK Training

# PARTNER



## Financial Transactions – Benchmarking for Transfer Pricing Analysis

Code: FA28 From: 29 September - 3 October 2025 City: Amsterdam Fees: 4200 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.

A graphic of a chessboard with several chess pieces, including a king, queen, and pawns, arranged on the board. The text 'UK Training PARTNER' is overlaid on the image.

UK Training  
**PARTNER**

- 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](mailto:Sales@blackbird-training.com)  
Website: [www.blackbird-training.com](http://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)



Salzburg (Austria)



Florence (Italy)



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)  
(Kuwait)



Phuket (Thailand)



Shanghai (China)



Dubai (UAE)



Kuala Lumpur (Malaysia)



Kuwait City



Seoul (South Korea)



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

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

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**

