



*Training Course:  
Transfer Pricing: Principles, Compliance &  
Strategic Application*

*10 - 14 November 2025  
Amsterdam (Netherlands)*

## Training Course: Transfer Pricing: Principles, Compliance & Strategic Application

Training Course code: FI236292 From: 10 - 14 November 2025 Venue: Amsterdam (Netherlands) - Training Course Fees: 5500 € Euro

### Introduction

Transfer Pricing TP has become a critical aspect of global taxation and corporate strategy. With the expansion of multinational enterprises MNEs, tax authorities across the world are placing increased scrutiny on intra-group transactions to ensure they comply with the arm's length principle. This 5-day program equips participants with the knowledge and tools required to design, document, and defend transfer pricing policies, aligned with OECD guidelines, local regulations, and BEPS Base Erosion and Profit Shifting standards.

### Objectives

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

- Understand the principles and objectives of transfer pricing.
- Apply OECD guidelines and local regulatory requirements in practice.
- Select and apply appropriate transfer pricing methods.
- Prepare compliant documentation and reporting.
- Develop strategies to manage transfer pricing risks and disputes.

### Target Audience

- Tax managers and advisors
- Finance and accounting professionals
- Auditors and compliance officers
- Legal and regulatory professionals
- Executives of multinational enterprises MNEs

### Training Program Outline

#### Day 1 - Foundations of Transfer Pricing

- Overview of Transfer Pricing: Purpose, challenges, and global importance.
- OECD Transfer Pricing Guidelines & BEPS framework.
- The Arm's Length Principle: Concept, relevance, and examples.
- Types of intra-group transactions tangible goods, intangibles, services, financing.
- International developments and local country perspectives.
- Case study: Identifying transfer pricing issues in a multinational group.

#### Day 2 - Transfer Pricing Methods

- Traditional transaction methods: CUP, Resale Price, Cost Plus.
- Transactional profit methods: TNMM, Profit Split Method.
- Selection criteria: comparability factors, data availability, industry practices.
- Practical exercise: Applying TP methods to sample transactions.
- Strengths and limitations of each method.
- Group discussion: Choosing the "most appropriate method."

#### Day 3 - Transfer Pricing Documentation & Compliance

- Local files, master file, and Country-by-Country Reporting CbCR.
- Documentation requirements under OECD and local laws.
- Functional and risk analysis FAR.
- Benchmarking and comparables search process.
- Preparing TP reports that withstand audits.
- Practical workshop: Drafting a simplified TP documentation package.

#### Day 4 - Transfer Pricing for Specific Transactions

- Intra-group services: management fees, cost allocation, shared services.
- Intangible property: licensing, royalties, and valuation of IP.

- Financial transactions: intercompany loans, guarantees, and cash pooling.
- Business restructurings and supply chain models.
- Practical examples from real cases.
- Role-play: Negotiating intra-group service charges.

#### Day 5 - Risk Management, Audits & Dispute Resolution

- Transfer Pricing audits: common challenges and strategies.
- Penalties, adjustments, and double taxation risks.
- Advance Pricing Agreements APAs - bilateral and unilateral.
- Dispute resolution: MAP Mutual Agreement Procedure, arbitration, litigation.
- Developing a sustainable TP policy: governance, monitoring, updates.
- Final simulation: Designing a TP framework for a multinational case study.

## Registration form on the Training Course: Transfer Pricing: Principles, Compliance & Strategic Application

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Complete & Mail or fax to Global Horizon Training Center (GHTC) at the address given below

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