XCELERATE TRAINING INSTITUTE

your learning & development partner

TAX AND REVENUE

Transfer Pricing in Taxation

DURATION	LANGUAGE	FORMAT
5 days	English	Classroom / Online

Upcoming dates

Dates	Venue	Format	Fee
17 – 21 ???? 2027	Live online	Online (live)	€1?200
22 – 26 ?????? 2027	Live online	Online (live)	€1?200
27 – 31 ?????? 2027	Bahrain	Classroom	€3?800

Register or ask a question

Online: staging.x8ti.com/course/transfer-pricing-in-taxation/

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Transfer Pricing in Taxation

Introduction

Introduction

Transfer Pricing is arguably the most important tax issues faced by international companies and tax administrations. It also remains a leading and challenging issue for tax and financial specialists of international companies and tax authorities.

This Xcelerate Training Institute course explores the transfer pricing issues confronting a multinational group that operates in a number of jurisdictions around the globe. Owing to the OECD BEPS statements on the topic of transfer pricing, the curiosity in transfer pricing has risen even more.

The crucial new terms in the field of international taxation are ‘substance’ and ‘transparency’, and these stipulations are relevant to transfer pricing as well. This program has been particularly customized for the functional needs of tax, finance and transfer pricing experts working with the tax authorities and in a variety of trade and service sectors.

The course, which also discusses some case studies, considers the transfer pricing issues relating to manufacturing, distribution, R&D, finance and management operations of multinational businesses. These classes are complemented by a session on dispute avoidance and resolution in the context of the case study.

This Xcelerate Training Institute course will empower you with the guidance to not only implement the general principles of transfer pricing but will also enable you to engage with the relevant authorities in the territories that you are currently working in.

Learning Objectives

- Gain a comprehensive grounding in all aspects of transfer pricing
- Understand the importance and principles of international transfer pricing in their professions.
- Tackle the significant issues within different sectors, extracting and discussing vital points to ensure you gain a thorough understanding of the topics
- Evaluate transactions of international cross border exchange of good, services and intangibles Identify the significance of a unified international political approach through the BEPS project.
- Appreciate the focus of the government on transfer pricing in the Middle East and North Africa.
- Proactively comply and implement processes and policies with future anticipated regulations.

Training Methodology

This is a collaborative training program and will consist of the following training mechanisms:

- Lectures
- Seminars & Presentations
- Group Discussions

- Assignments
- Case Studies & Functional Exercises

Like all our courses, this program also adheres to the ‘Do-Review-Learn-Apply’ model.

Benefits For Your Organization

Companies who send their employees to partake in this course can benefit in the following ways:

- Obtain a customized and all-inclusive transfer pricing in taxation program with features best suited to address your organization's needs
- Produce a detailed transfer pricing in taxation profile for your organization
- Save on legal expenses risen due to transfer pricing in taxation violations
- Ensure that your company is running with the most streamlined processes related to transfer pricing in taxation
- Provide your employees with access to key concepts in transfer pricing in taxation using interactive activities and a wealth of additional resources
- Employ the right people to ensure that the transfer pricing in taxation policies are implemented properly

Benefits For You

The participants of this course can benefit in the following ways:

- Explain the factors that drive the need for transfer pricing in taxation, and understand the consequences of breaching these laws in a highly legalized world
- Promote your understanding of the tax authorities, their powers and operations
- Prevent your company from the probable issues faced due to improper transfer pricing in taxation processes
- Refresh your knowledge by learning from tax experts who are more experienced in the underlying issues behind improper transfer pricing in taxation mechanisms
- Create strategies for implementing transfer pricing in taxation policies including specific tools and technologies, and then monitoring and training of these policies to build an effective transfer pricing in the taxation compliance program
- Gain from the wide range of content created by prominent tax experts from around the world

Target Audience

This course would be suitable for:

- Transfer pricing advisors
- Accountants
- Tax inspectors
- Legal counsel and lawyers
- General tax practitioners
- Tax practitioners in advisory firms
- Beginners in tax commercial and trade industries

- Government officials from revenue authorities and finance ministries
- In house tax directors/managers
- Tax regulation bodies
- Financial analysts

Course Outline

INTRODUCTION TO TRANSFER PRICING

- OECD guidelines, the BEPS project and approach
- Legislative framework
- Arm’s length principle: Concept of comparability and the transfer pricing methods

INTRODUCTION AND IMPORTANCE TO MULTINATIONALS

- Groups and tax administrations
- Transfer pricing documentation:
- Content
- Purpose
- Guidelines
- Master and local file
- Country-by-country reporting
- Transfer pricing dispute avoidance and resolution.
- Procedures for avoidance and resolution of transfer pricing disagreements

COMPARABILITY

- Transfer pricing impact over the business:
- Specific issues for the transfer pricing of goods and services, intangibles and financing
- Compliance, implementation and monitoring of risk management
- Ongoing costs in maintaining a robust contemporaneous environment

PRICE METHODS

- Comparable uncontrolled price method
- Resale Price Method
- Cost-plus profit Method
- Transactional net margin method

COOKIES CASE INTEGRATING PRACTICE

- Integrated practice
- Profit Split Method
- Administrative Aspects of Transfer Pricing Control
- Transfer pricing from Brazilian legislation

ADVANCE PRICING AGREEMENTS

- Mutual agreement procedure
- Arbitration

TRANSFER PRICING POST-BEPS

- Workshop Transfer Pricing and Digitization
- OECD Discussion on Transfer Pricing Features of Financial Transactions
- New OECD Project to Revise the Guidance
- Chapter VII of the OECD TP Guidelines
- Special Considerations for Intro-Group Services

CASE STUDY PART 1 – INTRA-GROUP SERVICES

- Management service fees
- Identification of chargeable services
- Service charge computation

CASE STUDY PART 2 – MANUFACTURING AND DISTRIBUTION ACTIVITIES

- Risk analysis
- Functional analysis
- Marketing intangibles
- Methodology selection
- Other pricing considerations

CASE STUDY PART 3 – FINANCIAL ACTIVITIES

- Risk analysis
- Loan pricing policy
- Guarantee fees

CASE STUDY PART 4 – R&D ACTIVITIES AND IP OWNERSHIP

- Contract R&D
- Royalty rate determination
- Cost contribution arrangements

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Registration Form

Transfer Pricing in Taxation

Preferred dates: ..... Venue or online: .....

Duration: 5 days Language: .....

Please complete and email this form to us, or register online. We confirm your place and send the invoice within one working day.

Delegate information

Full name (Mr / Ms / Dr / Eng): .....

Position: ..... Telephone / mobile: .....

Official email: ..... Personal email: .....

Company information

Company name: .....

Address: .....

City / country: ..... VAT / tax number: .....

Person responsible for training & development

Full name (Mr / Ms / Dr / Eng): .....

Position: ..... Telephone / mobile: .....

Email: .....

Payment

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Email this form
info@x8ti.com

Register online
Open the course page