

Mastering Transfer Pricing: Strategies for Global Taxation





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Ref: 32126_138829 Date: 08 - 12 Sep 2025 Location: Paris (France) Fees: 4400 Euro

Course Description

This intensive 5-day course provides a comprehensive introduction to transfer pricing fundamentals. Participants will gain in-depth knowledge of key concepts, methodologies, and practical applications of transfer pricing in multinational enterprises. The course covers international guidelines, pricing methods, documentation requirements, and dispute resolution mechanisms.

Learning Objectives

- Understand the principles and importance of transfer pricing in global taxation
- Master various transfer pricing methods and their appropriate applications
- Learn to conduct functional and economic analyses for transfer pricing
- Develop skills in transfer pricing documentation and compliance
- Gain insights into managing transfer pricing audits and disputes
- Explore advanced topics including intangibles and financial transactions

Course Modules

Day 1: Introduction to Transfer Pricing

- Overview of transfer pricing concepts and principles
- OECD Guidelines and international framework
- Arm's length principle and comparability analysis
- Transfer pricing in the context of BEPS

Day 2: Transfer Pricing Methods

- Traditional transaction methods CUP, Resale Price, Cost Plus
- Transactional profit methods TNMM, Profit Split
- Selection and application of appropriate methods
- Case studies and practical examples

Day 3: Functional and Economic Analysis

- Conducting functional analysis
- Industry and economic analysis techniques
- Value chain analysis in transfer pricing
- Benchmarking studies and databases



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Day 4: Documentation and Compliance

- Transfer pricing documentation requirements
- Master File, Local File, and Country-by-Country Reporting
- Risk assessment and management
- Advance Pricing Agreements APAs

Day 5: Advanced Topics and Dispute Resolution

- Transfer pricing for intangibles and financial transactions
- Handling transfer pricing audits
- Dispute resolution mechanisms and MAP
- Future trends in transfer pricing

Practical Wins for Participants

- Ability to implement robust transfer pricing policies in their organizations
- Skills to prepare and review transfer pricing documentation
- Strategies to mitigate transfer pricing risks and manage audits
- Insights to optimize transfer pricing in various business scenarios



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