

Mastering Transfer Pricing: Strategies for Global Taxation

Customs Management & Global Trade Compliance
Kigali (Rwanda)
03 - 07 Nov 2025

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A large, detailed image of chess pieces on a checkered board. In the foreground, a gold king piece stands prominently on a light square. To its left, a silver pawn is on a dark square. Further back, another silver pawn is visible. The background features concentric circles radiating from behind the king piece, creating a sense of depth and focus.

Mastering Transfer Pricing: Strategies for Global Taxation

Ref: 32126_138850 **Date:** 03 - 07 Nov 2025 **Location:** Kigali (Rwanda) **Fees:** 3300 **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

A graphic of a chessboard with several chess pieces (king, queen, pawns) on it. The text 'UK Training PARTNER' is overlaid on the board.

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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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