

ADVANCED PROFESSIONAL CERTIFICATE IN **TRANSFER PRICING** (APCTP-I)

Course Information



LEARNING OBJECTIVES

- Appreciate the importance of international transfer pricing in multinational enterprise groups and tax administrations
- Being able to solve complex issues in the field of transfer pricing with respect to topics such as intra-group financing, intra-group services, benchmarking & valuation and intangibles

PREREQUISITES

The course is open for all, however it would be highly beneficial for:

- Professionals with more than 3 years of experience in any of the following fields with an avid interest in TP: tax/law/accounting/ finance/ treasury/ controlling with any corporate/ MNE / accounting firms/ tax advisories
- Professionals of any domain working in the field of Transfer Pricing and having more than 3 years of experience

STUDY TIME

This certification programme consists of four online courses. Each online course has five to seven modules. A module has the following components: reading materials, videos, one to two assignments in the form of a case study followed by assessments.

Recommended study time needed per module:

Reading materials:	120 - 150 minutes
Videos:	60 - 80 minutes
Assignment(s):	60 - 90 minutes
Assessments:	60 - 80 minutes

We expect you to complete a module in one week with the study time suggested above.

The programme must be completed within 6 months and can be followed and completed by dedicating at least 5 hours of study per week. Study materials included in the programme will be accessible for 6 months only (the duration of the programme).

ADVANCE PREPARATION

No advanced preparation is necessary.

All study material is provided in the online course.

COURSE PROGRAM

Online courses	Modules covered
Online course 1 Transfer Pricing and Intra-group Financing	<ul style="list-style-type: none"> • Introduction to transfer pricing and intra-group financing • Loans • Credit ratings • Guarantees • Cash pooling • Implementation of a robust treasury function within an MNE
Online course 2 Transfer Pricing and Intra-group Services	<ul style="list-style-type: none"> • Introduction to transfer pricing and intra-group services • What is a chargeable service? • Determining arm's length remuneration • Cost sharing arrangement and cost contribution arrangement • Dealing with Intra-Group Services within an MNE
Online course 3 Benchmarking and Valuation	<ul style="list-style-type: none"> • Roadmap for conducting a transfer pricing comparability analysis • Identifying comparables – tangible assets and intragroup services • Identifying comparables – financing transactions and intangible assets • Comparability adjustments and determining the range • Pricing of loans and guarantees • Valuation of intangibles
Online course 4 Intangibles	<ul style="list-style-type: none"> • Importance of Intangible Property (IP) in Global Value Chains • Identifying intangible property • Attribution of intangible related returns • Hard-to-value intangibles • Regional and Sectoral challenges in analysing intangibles • IP planning / structuring
Final Assessments	<ul style="list-style-type: none"> • After every module

COURSE DEVELOPERS

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