

COURSE PROGRAMME

Transfer Pricing Controversy

Course Programme

Modules

Topics Covered

Setting the scene: Transfer Pricing controversy life cycle

- › Different phases of the TP controversy life cycle
- › Roadmap to building a robust TP compliance strategy
- › TP implications of the COVID-19 pandemic

Compliance around the globe: Practical aspects

- › Key compliance challenges for MNEs and tax authorities
- › Roadmap to build a robust TP compliance strategy/defence files
- › Court case discussion and lessons learnt
- › Automation of TP compliance

Transfer Pricing risk assessment

- › Main challenges when undertaking an effective TP risk assessment – tax authority perspective
- › Strategy to actively manage TP risks – MNE perspective
- › Expert interview on a practical guide to detect TP risks

How to survive a transfer pricing audit?

- › Tools to survive a TP audit – do's and don'ts during TP audit, how to prepare for an audit, and how to train the organization for an audit
- › Current controversies and trends including common themes in tax authority approaches in TP audits
- › Relevance of joints audits and ICAP

Transfer Pricing controversy management: Dispute prevention and resolution

- › TP controversy management roadmap including practical tools, strategies and practices
- › Effective organization of internal procedures and dispute resolution functions
- › Interview setting on the impact of Pillar One on the global TP controversy landscape

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Topics Covered

Transfer Pricing controversy: Stakeholders and effective negotiation

- › Importance of negotiation and storytelling skills
- › Principles of negotiation
- › Strategies for effective negotiation during transfer pricing disputes:
competent authority perspective

Regional and sectoral trends

- › Main sources of disputes
- › Specific challenges in developing countries
- › Addressing TP controversies through tax risk management and control

Content last reviewed

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Course Developers

Adriaan Bijleveld

KPMG | The Netherlands

Joris Nijhuis

Taxtimbre | The Netherlands

Marta Kazmierczak

Van Moof | The Netherlands

Eduard Sporken

KPMG | The Netherlands

Marek Firlej

Independent | Poland

Monica Erasmus-Koen

Taxtimbre | The Netherlands

Eric Vroemen

PwC | The Netherlands

Mariusz Kazuch

Independent | Poland

Sharvari Kale

IBFD | The Netherlands

Geoff Morris

Independent | The Netherlands

Completion requirements

To benefit from the learning experience for this training, completing all audio-visual components and assignments is mandatory to obtain your certificate. Upon access to the learning platform, the syllabus will indicate the exact completion requirements. Please also consult the [FAQ](#) for more information.