

COURSE INFORMATION

Transfer pricing aspects of corporate international tax structuring

Level

Intermediate

Completion requirements

To benefit from the learning experience of this training, completing all mandatory components is necessary 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.

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Course Programme

Modules

Topics Covered

The role of transfer pricing in international tax structuring

- > Transfer pricing in tax structuring
- > Transfer pricing and supply chain structures, including impact of OECD Pillar One developments
- > Transfer pricing and IP structures

Transfer pricing methodology in the OECD Transfer Pricing Guidelines

- > The 9-step process in the application of the arm's length principle
- > Selection of tested party and transfer pricing methods
- > Defining and selecting comparables

Applying the arm's length principle to intragroup transactions

- > Determining transfer pricing policies for different types of intra-group transactions
- > Implementation of transfer pricing policies
- > Transfer pricing documentation

Transfer pricing dispute and avoidance and resolution

- > Sources of transfer pricing disputes
- > Mechanism for dispute resolutions under tax treaties and other international instrument
- > Advanced pricing agreements and dispute avoidance

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