



Level

Intermediate

Programme start date

1 November 2023

Completion requirements

To benefit from the learning experience for 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 <u>FAQ</u> for more information.



Certificate Programme

Online course 1 Transfer Pricing and Business Restructuring

- > Business models and digital transformation
- > Importance of business restructurings: Tax perspective
- > Recognition of business restructuring
- > Arm's length considerations for restructuring
- > Conversion issues and post restructuring issues
- > Selected issues in global value chain analyses
- > Business restructurings and indirect taxes

Online course 2 Transfer Pricing Controversy

- > Setting the scene: Transfer pricing controversy lifecycle
- > Compliance around the globe: Practical aspects
- > Transfer pricing risk assessment
- > How to survive a transfer pricing audit
- > Transfer pricing controversy management: Dispute prevention and resolution
- > Transfer pricing controversy: Stakeholders and effective negotiation
- > Regional and sectoral trends

Online course 3 Transfer Pricing and Indirect Taxation

- > Introduction and the role of value in transfer pricing, VAT and customs
- > Interaction between transfer pricing and indirect taxes in global supply chains
- > Impact of adjustments
- > Cooperation, exchange of information and administrative issues

Online course 4 Operational Transfer Pricing

- > Introduction to Operational Transfer Pricing (OTP)
- > Components of OTP
- > Supply chains, segmentation and segmentation drivers
- > Tangible goods
- Service charges and cost allocation (SC&CA)

Final Assessments | After every module



Course Developers

TRANSFER PRICING AND BUSINESS RESTRUCTURING

Bo Wingerter Sharvari Kale Britt de Moor

Hans Geluk Zachary Somers Jeroen Kuppens

Danone | The Netherlands IBFD | The Netherlands KPMG | The Netherlands

Bram leBruyn Pieter van Lunen Brian Mulier

Deloitte | Belgium PwC | The Netherlands Bird&Bird | The Netherlands

TRANSFER PRICING CONTROVERSY

Eric Vroemen Marta Kazimierczak Eduard Sporken

Monica Erasmus Mariusz Kazuch Adriaan Bijleveld

Taxtimbre | The Netherlands Poland KPMG | The Netherlands

Joris NijhuisMarek FirleyGeoff MorrisTaxtimbre | The NetherlandsPolandinTP | Australia

TRANSFER PRICING AND INDIRECT TAXES

 Brian Mulier
 Julie Lere Pland
 Eduardo Flöring

 Bird&Bird | The Netherlands
 KPMG | United Arab Emirates
 Huf Group | Germany

Ioan Sabau Monica Erasmus

Goodyear | Luxembourg Taxtimbre | The Netherlands

OPERATIONAL TRANSFER PRICING

Denis VikhrevLars Wiig AndersenRaymond MoskvilEY | The NetherlandsEY | NorwayEY | Norway

Marcel van den Brink

Santiago Alvarez Gourdin

Emanuel Baptista

Ekaterina Goydina

EY | Spain



IBFD Head Office

Rietlandpark 301
1019 DW Amsterdam
P.O. Box 20237
1000 HE Amsterdam
The Netherlands
Tel.: +31-20-554 0100 (GMT+1)
Email: info@ibfd.org

Social media

in Follow IBFD on LinkedIn

International Online Tax Courses

Tel.: +31-20-554 0176 **Email:** info@ibfd.org

Tailored Tax Courses

Tel.: +31-20-554 0176

Email: tailoredcourses@ibfd.org

Free services

IBFD offers a wide range of free email services on international taxation to keep you up-to-date on subjects of your interest. Sign up today at www.ibfd.org/Tax-insights.





