

## PROGRAMME

# Advanced Professional Certificate in Transfer Pricing - 1

**Level**

Intermediate

**Programme start date**

1 April 2024

**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 [FAQ](#) for more information.

## Certificate Programme

### Online course 1 **Benchmarking and Valuation**

- Roadmap for conducting a transfer pricing comparability analysis
- Identifying comparables – tangible assets and intra-group services
- Identifying comparables – financing transactions and intangible assets
- Comparability adjustments and determining the range
- Pricing of loans and guarantees
- Valuation of intangibles

### Online course 2 **Transfer Pricing and Intra-Group Services**

- 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 **Transfer Pricing and Intra-Group Financing**

- 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 4 **Transfer Pricing and Intangibles**

- Importance of intangible property (IP) in global value chains
- Identifying IP
- Attribution of intangible-related returns
- Hard-to-value intangibles
- Regional and sectoral challenges in analysing intangibles
- IP planning/structuring

### **Final Assessments | After every module**

This programme is subject to change

## Course Developers

### BENCHMARKING AND VALUATION

**Frank Schwarte**

Atlas | The Netherlands

**Rezan Ökten**

Houthoff | The Netherlands

**Taco Wiertsema**

Atlas | The Netherlands

**Gijs van Koeveringe**

Houthoff | The Netherlands

**Sharvari Kale**

IBFD | The Netherlands

**Vladimir Zivkovic**

Baker & McKenzie | The Netherlands

**Olaf Smits**

Ectacon | The Netherlands

**Sebastian Frankenberg**

Hermes Advisory | The Netherlands

**Zachary Somers**

IBFD | The Netherlands

### TRANSFER PRICING INTRA-GROUP SERVICES

**Luis Coronado**

EY | Singapore

**Sandra Esteves**

SABIC | The Netherlands

**Shee Boon Law**

DLA Piper | The Netherlands

**Rajesh Bheemanee**

EY | Singapore

**Sharon Tan**

EY | Singapore

**Tanya Gartsman**

Mazars | The Netherlands

### TRANSFER PRICING INTRA-GROUP FINANCING

**Adje Ametepe**

EY | France

**Benoît Gabelle**

EY | France

**Omar Moerer**

Deloitte | The Netherlands

**Andre Dekker**

Baker & McKenzie |  
The Netherlands

**Krzysztof Łukosz**

EY | The Netherlands

**Rezan Ökten**

Houthoff | The Netherlands

**Antonio Russo**

Baker & McKenzie |  
The Netherlands

**Mark Drenth**

Liberty Global | The Netherlands

**Urszula Chwała**

LyondellBasell | The Netherlands

**Neil Schaatsbergen**

PwC | The Netherlands

## Course Developers

### TRANSFER PRICING AND INTANGIBLES

**Ágata Uceda**

KPMG | The Netherlands

**Giammarco Cottani**

Netflix | The Netherlands

**Maaïke van Velzen**

Deloitte | The Netherlands

**Anuschka Bakker**

IBFD | The Netherlands

**Isabel Verlinden**

PwC | Belgium

**Önder Albayrak**

Sanofi | The Netherlands

**David van Peursen**

Deloitte | The Netherlands

**Kerry Lambrou**

Deloitte | The Netherlands

**Pim Gerritsen van der Hoop**

Deloitte | The Netherlands

**Froukje Frerichs**

Deloitte | The Netherlands

**Lucas de Heer**

Netflix | The Netherlands

**Sjoerd Haringman**

Deloitte | The Netherlands

**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](mailto:info@ibfd.org)

**International Online Tax Courses**

Tel.: +31-20-554 0176  
Email: [info@ibfd.org](mailto:info@ibfd.org)

**Tailored Tax Courses**

Tel.: +31-20-554 0176  
Email: [tailoredcourses@ibfd.org](mailto: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](http://www.ibfd.org/Tax-insights).

**Social media**

 Follow IBFD on LinkedIn

 Join our group Friends of IBFD

 Follow us on Twitter

