

## PROGRAMME

# Advanced Professional Certificate in Transfer Pricing - 1

**Level**

Intermediate

**Programme start date**

1 October 2025 - 31 March 2026

**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

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### TRANSFER PRICING INTRA-GROUP SERVICES

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### TRANSFER PRICING INTRA-GROUP FINANCING

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