



## Level

Intermediate

# Programme start date

1 November 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 <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

This programme is subject to change



## **Course Developers**

## TRANSFER PRICING AND BUSINESS RESTRUCTURING

Sharvari Kale **Bo Wingerter Britt de Moor** 

EY | The Netherlands IBFD | The Netherlands PwC | The Netherlands

Hans Geluk **Zachary Somers** Jeroen Kuppens

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

Pieter van Lunen **Brian Mulier** Bram leBruyn

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

## TRANSFER PRICING CONTROVERSY

Marta Kazimierczak **Eric Vroemen Eduard Sporken** 

PwC | The Netherlands VanMoof | The Netherlands KPMG | The Netherlands

**Monica Erasmus** Mariusz Kazuch Adriaan Bijleveld

Taxtimbre | The Netherlands Poland KPMG | The Netherlands

**Geoff Morris** Joris Nijhuis **Marek Firley** Poland inTP | Australia Taxtimbre | The Netherlands

## 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** 

Taxtimbre | The Netherlands Goodyear | Luxembourg

## OPERATIONAL TRANSFER PRICING

**Denis Vikhrev** Lars Wiig Andersen Raymond Moskvil EY | The Netherlands EY | Norway EY | Norway

Marcel van den Brink EY | The Netherlands EY | United Kingdom EY | Spain

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

## International Online Tax Courses

Email: onlinecourses@ibfd.org

#### Online certification programmes

Email: certification@ibfd.org

#### **Tailored Tax Courses**

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

## Social media

Follow IBFD on LinkedIn:
www.linkedin.com/company/ibfd

In Join our group Friends of IBFD: link.ibfd.org/Friends\_of\_IBFD

Follow us on X:

@IBFD\_on\_Tax

