

PROGRAMME

Advanced Professional Certificate in Transfer Pricing - 1

Level

Intermediate

Programme start date

1 April - 30 September 2025

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

Maike 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

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

 Join our group Friends of IBFD:
link.ibfd.org/Friends_of_IBFD

 Follow us on X:
[@IBFD_on_Tax](https://twitter.com/IBFD_on_Tax)

