

PROGRAMME

# Advanced Professional Certificate in Transfer Pricing - 2

## Level

Intermediate

## Programme start date

1 May - 31 October 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 **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

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