Transfer Pricing Documentation & Country File Workshop Training Course

Professional Development Training Course Outline

Category	Taxation and Revenue	**Duration**	5 Days
Base Fee	$1,500 USD	**Delivery Mode**	Online / On-site Hybrid

Course Introduction

Transfer pricing compliance has become a central focus for multinational enterprises due to increasing scrutiny by tax authorities worldwide. With global tax reforms and BEPS (Base Erosion and Profit Shifting) regulations, companies are now required to provide robust documentation to support intercompany transactions and demonstrate adherence to arm's length principles. Transfer Pricing Documentation & Country File Workshop Training Course is designed to equip tax professionals, finance managers, and compliance officers with practical skills in preparing Transfer Pricing Documentation and Country Files that meet international standards, ensuring transparency and minimizing audit risks.

The course emphasizes hands-on learning, combining theoretical frameworks with real-life case studies to enhance analytical skills in transfer pricing documentation. Participants will gain insights into benchmarking, functional and risk analysis, and local file and master file preparation. By the end of the course, attendees will be able to apply best practices in compliance, manage regulatory requirements efficiently, and contribute to strategic tax planning.

Programme Curriculum

Transfer Pricing Documentation & Country File Workshop Training Course

Introduction

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Course Objectives

1. Understand global transfer pricing regulations and OECD guidelines.
2. Develop comprehensive Transfer Pricing Documentation and Country Files.
3. Analyze intercompany transactions and identify risk exposure.
4. Apply arm's length principle in practical scenarios.
5. Conduct benchmarking studies and comparability analysis.
6. Identify and implement functional and risk analysis methodologies.
7. Interpret regulatory expectations in different jurisdictions.
8. Prepare Local File and Master File in line with OECD standards.
9. Implement effective compliance strategies to minimize audit risks.
10. Strengthen internal reporting and documentation processes.
11. Enhance decision-making for multinational tax planning.
12. Review real-world case studies to apply knowledge practically.
13. Optimize transfer pricing policies to align with business strategy.

Organizational Benefits

- Improved compliance with OECD and local transfer pricing regulations.
- Reduced risk of penalties and audits by tax authorities.
- Standardized documentation across multinational operations.
- Enhanced strategic decision-making in intercompany pricing.
- Strengthened credibility with stakeholders and tax authorities.
- Improved transparency and governance in transfer pricing.
- Increased internal expertise and capacity in transfer pricing management.
- Streamlined processes for documentation and reporting.
- Better alignment of transfer pricing with corporate objectives.
- Practical skills applicable to real-world intercompany transactions.

Target Audiences

- Tax managers and tax directors
- Finance managers and CFOs
- Transfer pricing professionals
- Internal audit officers
- Compliance officers
- Multinational enterprise executives
- Accounting and finance staff
- Legal advisors in taxation

Course Duration: 5 days

Course Modules

Module 1: Introduction to Transfer Pricing

- Overview of transfer pricing and its significance in multinational operations
- OECD Transfer Pricing Guidelines and local regulations
- Key principles and terminology
- Understanding functional analysis and risk allocation
- Case Study: Analyzing a multinational's intercompany pricing scenario
- Practical exercise: Identifying related-party transactions

Module 2: Transfer Pricing Documentation Requirements

- Overview of documentation requirements in different jurisdictions
- Local File and Master File components
- Understanding compliance timelines and obligations
- Preparing supporting schedules and tables
- Case Study: Preparing a Local File for a regional entity
- Practical exercise: Organizing relevant financial data

Module 3: Functional Analysis & Risk Assessment

- Identifying functions, assets, and risks of associated enterprises
- Risk allocation methods and their implications
- Functional profiling for transfer pricing purposes

- Case Study: Risk assessment of an intercompany service transaction
- Practical exercise: Mapping functions and risks
- Tools for documenting functional analysis

Module 4: Benchmarking and Comparability Analysis

- Conducting comparability analysis for transfer pricing
- Selecting appropriate comparables and data sources
- Adjustments for functional and risk differences
- Case Study: Benchmarking a tangible goods transaction
- Practical exercise: Conducting a comparable search
- Using databases and analytics tools effectively

Module 5: Local File Preparation

- Key contents of a Local File
- Aligning documentation with regulatory requirements
- Preparing narrative and financial sections
- Case Study: Drafting Local File for an intercompany loan
- Practical exercise: Writing functional analysis sections
- Reviewing Local Files for completeness and compliance

Module 6: Master File Preparation

- Purpose and scope of the Master File
- Key data points to include
- Consolidating global transfer pricing policies
- Case Study: Creating Master File for a multinational group
- Practical exercise: Cross-referencing Master and Local Files
- Strategies to ensure consistency across files

Module 7: Advanced Transfer Pricing Issues

- Intangibles, cost sharing arrangements, and financial transactions
- Transfer pricing adjustments and dispute resolution
- Country-by-Country Reporting (CbCR) overview
- Case Study: Managing an intangible property transaction

- Practical exercise: Adjusting intercompany pricing
- Analyzing tax authority challenges

Module 8: Audit Preparedness & Compliance Strategies

- Preparing for transfer pricing audits
- Risk management and documentation review processes
- Responding to audit queries effectively
- Case Study: Simulating a tax authority audit
- Practical exercise: Reviewing and defending documentation
- Developing a proactive compliance strategy

Training Methodology

- Interactive lectures with real-world examples
- Case studies covering regional and global scenarios
- Hands-on exercises in documentation preparation
- Group discussions and problem-solving sessions
- Benchmarking and functional analysis workshops
- Role-playing audit scenarios for practical understanding

Register as a group from 3 participants for a Discount

Send us an email: info@fineskilltrainingcenter.org or call *+254769199797*

Certification

Upon successful completion of this training, participants will be issued with a globally- recognized certificate.

Tailor-Made Course

We also offer tailor-made courses based on your needs.

Key Notes

a. The participant must be conversant with English.

b. Upon completion of training the participant will be issued with an Authorized Training Certificate

c. Course duration is flexible and the contents can be modified to fit any number of days.

d. The course fee includes facilitation training materials, 2 coffee breaks, buffet lunch and A Certificate upon successful completion of Training.

e. One-year post-training support Consultation and Coaching provided after the course.

f. Payment should be done at least a week before commence of the training, to Fineskill Training Center account, as indicated in the invoice so as to enable us prepare better for you.

Upcoming Scheduled Sessions

Start Date	End Date	Location	Price
23 Nov 2026	27 Nov 2026	Online	$1,000
23 Nov 2026	27 Nov 2026	Physical	$1,500
23 Nov 2026	27 Nov 2026	Physical	$3,000
23 Nov 2026	27 Nov 2026	Physical	$3,000
23 Nov 2026	27 Nov 2026	Physical	$6,000
23 Nov 2026	27 Nov 2026	Physical	$4,500
23 Nov 2026	27 Nov 2026	Physical	$6,000
23 Nov 2026	27 Nov 2026	Physical	$6,000

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