



TAX AND LEGAL TRAINING

Transfer Pricing and International Tax Structuring

3 day course

Classroom, online or in-house

Course overview

Transfer pricing exposure is created by ordinary operating decisions such as where a service is performed or which entity carries a loan, and it is discovered years later by an authority applying hindsight. This course covers managing it deliberately. Delegates work through the arm's length principle and what it requires in practice, and functional analysis, which is the step that determines everything after it. Comparability and the difficulty of finding comparables in African markets are addressed honestly. The transfer pricing methods are covered on when each applies. Intra group services, management fees and the benefit test follow, since these are the most commonly challenged. Intra group financing and thin capitalisation are addressed. Documentation requirements including master file, local file and country by country reporting are covered. The course closes on audit defence, on advance pricing arrangements and on structures that will not survive scrutiny.

What you will learn

- Apply the arm's length principle to real transactions
- Conduct a functional analysis that supports the pricing
- Address comparability where local comparables are scarce
- Select the appropriate transfer pricing method
- Defend intra group services and management fees on benefit
- Handle intra group financing and thin capitalisation limits
- Meet documentation requirements and prepare an audit defence

Who should attend

- Group tax managers of multinational and regional businesses
- Finance directors of companies with related party transactions
- Tax advisors and transfer pricing specialists
- Treasury managers structuring intercompany financing
- Revenue authority officials working on transfer pricing desks

Course outline

- 01 Exposure created by ordinary decisions
- 02 The arm's length principle
- 03 Functional analysis
- 04 Comparability in African markets
- 05 The transfer pricing methods
- 06 Intra group services and the benefit test
- 07 Financing and thin capitalisation
- 08 Documentation, audit defence and advance arrangements

Upcoming dates

Dates	Venue	Format	Fee per delegate
30 September to 2 October 2026	Johannesburg, South Africa	Classroom	R14,950
3 to 5 February 2027	Online	Online	R6,500
15 to 17 February 2027	Accra, Ghana	Classroom	USD 995



Fees and how to register

This 3 day course is **R6,500** per delegate online, **R14,950** in the classroom in South Africa, Botswana, Namibia, Lesotho and Eswatini, and **USD 995** in the classroom elsewhere in Africa. In-house training is quotation on request. Book 2 or more delegates on this course and save 10%.

To register or request an in-house proposal, visit www.afrisciencegroup.com, email info@afriscience.co.za, or WhatsApp us on **+27 63 479 1136**.

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