

Transfer Pricing and Documentation Governance Training Course

10 – 21 January 2027
Nairobi

AGILE LEADERS
Training Center

Transfer Pricing and Documentation Governance Training Course

Ref: 187_214933 **Date:** 10 – 21 January 2027 **Location:** Nairobi **Fees:** 6400 Euro

Course Overview

Transfer Pricing and Documentation Governance Training Course is a two-week professional, jurisdiction-neutral course for tax, finance, accounting, legal, compliance, treasury, and audit personnel. Participants map related-party transactions, apply functional and comparability analysis, evaluate arm's-length methods, organise financial evidence, design documentation files, and build review and controversy-readiness controls. They leave with a Transfer Pricing Documentation Governance File. Agile Leaders Training Center delivers transfer pricing and documentation governance training.

Who Should Attend

- Tax personnel supporting transfer pricing analysis and documentation
- Finance and accounting personnel providing transaction and financial evidence
- Legal and compliance personnel reviewing agreements and governance controls
- Treasury personnel supporting related-party financing analysis
- Internal-audit personnel assessing evidence, approvals, and control operation

The course provides professional education, not tax or legal advice. Participants must verify current rules, thresholds, methods, deadlines, and filing obligations with the relevant jurisdiction and qualified advisers.

Departments and Industries

The course supports multinational and related-party operations across corporate groups, financial services, manufacturing, energy, technology, distribution, and professional services.

- Tax and finance
- Accounting and controlling
- Legal and compliance
- Treasury and corporate finance
- Internal audit and risk

Learning Objectives

By the end of this course, participants will be able to:

- Define controlled transactions and documentation boundaries
- Perform functional, risk, asset, and comparability analysis
- Evaluate transfer pricing methods and tested-party choices
- Structure master-file, local-file, and transaction evidence
- Reconcile documentation with agreements and financial records
- Build a Transfer Pricing Documentation Governance File

Course Agenda

Day 1: Transfer Pricing Framework

- Related-Party Relationship Map
- Controlled Transaction Identification Register
- Arm's-Length Principle Decision Notes
- Jurisdiction Requirement Verification Log
- Transfer Pricing Governance Boundary

Day 2: Transaction and Value-Chain Mapping

- Transaction Flow and Counterparty Map
- Value-Chain Contribution Diagram
- Intercompany Agreement Inventory
- Transaction Materiality and Risk Screen
- Evidence Owner Responsibility Matrix

Day 3: Functional Analysis

- Functions Performed Interview Guide
- Assets Employed Evidence Sheet
- Risk Control and Financial Capacity Test
- Entity Characterisation Decision Record
- Functional Analysis Narrative Builder

Day 4: Comparability Analysis

- Economically Relevant Characteristics Matrix
- Internal and External Comparable Screen
- Search Strategy and Rejection Log
- Comparability Adjustment Decision Sheet
- Comparable Reliability Review

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Day 5: Transfer Pricing Methods

- Comparable Uncontrolled Price Assessment
- Resale Price and Cost Plus Method Review
- Transactional Net Margin Method Test
- Profit Split Method Decision Factors
- Most Appropriate Method Rationale

Day 6: Financial Analysis and Testing

- Tested-Party Selection Record
- Profit-Level Indicator Definition Sheet
- Segmented Financial Data Bridge
- Arm's-Length Range Calculation Review
- Outcome and Adjustment Decision Log

Day 7: Policy and Intercompany Agreements

- Transfer Pricing Policy Architecture
- Transaction Pricing Rule Sheet
- Intercompany Agreement Alignment Check
- Operational Price-Setting Calendar
- Year-End True-Up Control

Day 8: Master and Local Documentation

- Master File Content Map
- Local File Evidence Index
- Controlled Transaction Documentation Pack
- Country-by-Country Information Linkage
- Document Version and Approval Control

Day 9: Risk and Controversy Readiness

- Transfer Pricing Risk Assessment Grid
- Authority Information Request Tracker
- Evidence Gap and Remediation Plan
- Audit Interview Preparation Sheet
- Dispute and Resolution Route Map

Day 10: Governance and Case Integration

- Cross-Functional Documentation Review
- Financial Reconciliation Exercise
- Method and Evidence Challenge Panel
- Governance Calendar and Quality Gate
- Capstone Transfer Pricing Documentation Governance File

Practical Exercises

Participants work through a jurisdiction-neutral related-party case and must identify where local verification or specialist advice is required.

- Suggested activity: map controlled transactions and evidence owners
- Suggested activity: complete functional and comparability analyses
- Suggested activity: compare methods and document the selection rationale
- Suggested activity: assemble and challenge a local-file evidence pack

FAQs

Who suits the Transfer Pricing and Documentation Governance Training Course?

The course suits professionals who support related-party transaction analysis, policy, financial evidence, agreements, documentation, controls, risk review, or audit readiness.

Does the course provide tax or legal advice for a particular country?

No. It is jurisdiction-neutral professional education. Participants must verify applicable law, guidance, thresholds, deadlines, and positions with local authorities and qualified advisers.

What is functional analysis?

Functional analysis examines the economically significant functions performed, assets employed, and risks assumed and controlled by each party, supported by actual conduct and evidence.

How are transfer pricing methods selected?

Method selection considers the accurately delineated transaction, available information, functional profile, comparable reliability, strengths and weaknesses of each method, and applicable local rules.

What belongs in the Transfer Pricing Documentation Governance File?

The file contains relationship and transaction maps, functional and comparability analyses, method rationale, financial bridges, agreements, evidence indexes, documentation structures, approvals, risk logs, and review calendars.

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Conclusion

Participants take back a governed workflow connecting related-party transactions, analysis, methods, financial evidence, agreements, documentation, and review. The Transfer Pricing Documentation Governance File improves traceability and readiness while preserving clear boundaries for local-law verification and qualified tax or legal advice.