

International Taxation and Transfer Pricing Training Course

7 – 11 December 2026
Kuala Lumpur

AGILE LEADERS
Training Center

International Taxation and Transfer Pricing Training Course

Ref: 1086_229102 **Date:** 7 – 11 December 2026 **Location:** Kuala Lumpur **Fees:** 5200 Euro

Overview

International Taxation and Transfer Pricing Training Course is a one-week advanced course for tax managers, finance managers, transfer pricing specialists, accountants, legal and compliance professionals, and advisers, who leave with an International Tax and Transfer Pricing Review Pack. Participants connect treaty positions with controlled transactions, perform functional and comparability analysis, select methods, review documentation, and define governance and dispute-prevention actions. Agile Leaders Training Center develops practical international tax review capability.

Who Should Attend

- Tax and finance managers responsible for cross-border positions
- Transfer pricing specialists reviewing controlled transactions
- Accountants preparing related-party data and documentation
- Legal and compliance professionals coordinating treaty and tax risk
- Advisers supporting international groups and transaction reviews

Participants should understand corporate taxation or financial reporting. The course is educational and does not provide legal advice, certification, domestic filing instruction, or a VAT-only syllabus.

Departments and Industries

The course supports organizations with cross-border activities or transactions between related persons.

- Tax, finance, accounting, legal, compliance, and internal audit
- Multinational groups, regional headquarters, and shared-service centres
- Manufacturing, distribution, technology, energy, and financial services
- Professional services, logistics, healthcare, retail, and infrastructure
- Businesses managing goods, services, financing, or intangible transactions

Learning Objectives

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

- Frame residence, source, permanent establishment, and treaty questions
- Map controlled transactions and apply the arm's-length principle
- Perform functional and comparability analysis
- Select and apply an appropriate transfer pricing method
- Review master file, local file, and transaction evidence
- Build governance and dispute-prevention actions

AGILE LEADERS
Training Center

Course Agenda

Day 1: International Tax Framework and Treaty Positions

- Residence, Source and Taxing-Rights Map
- Permanent Establishment Issue Checklist
- Business Profits and Withholding Tax Review
- Double-Tax Relief and Credit Analysis
- Tax Treaty Position Summary

Day 2: Controlled Transactions and Functional Analysis

- Related-Person and Controlled-Transaction Inventory
- Accurate Transaction Delineation Worksheet
- Functions, Assets and Risks Analysis
- Contract-to-Conduct Consistency Review
- Tested Party and Transaction Characterization

Day 3: Comparability and Transfer Pricing Methods

- Economically Relevant Characteristics Matrix
- Internal and External Comparable Review
- Comparability Adjustment Decision Log
- Transfer Pricing Method Selection Grid
- Arm's-Length Outcome Analysis

Day 4: Documentation, Transactions and Governance

- Master File and Local File Evidence Map
- Goods and Intra-Group Services Review
- Intangibles and Financial Transactions Review
- Country-by-Country Reporting Governance
- Transfer Pricing Control and Approval Matrix

Day 5: International Tax Review Practice

- Exercise: Analyze a Treaty and Permanent Establishment Position
- Exercise: Delineate a Controlled Transaction
- Exercise: Select a Method and Test Comparables
- Exercise: Review Documentation and Evidence Gaps
- Capstone Exercise: International Tax and Transfer Pricing Review Pack

Practical Exercises

Suggested activities connect transaction facts, treaty questions, economic analysis, documentation, and governance decisions.

- Suggested activity: map residence, source, withholding, and relief questions for a cross-border service
- Suggested activity: document functions, assets, risks, and actual conduct for a related-party transaction
- Suggested activity: compare methods and defend a method-selection decision
- Suggested activity: identify evidence gaps and assign documentation actions

FAQs

Who suits international taxation and transfer pricing training?

Tax, finance, accounting, legal, compliance, and advisory professionals who review cross-border or controlled transactions suit the course.

How does international taxation differ from transfer pricing?

International taxation considers taxing rights, residence, source, permanent establishments, withholding, treaties, and double-tax relief. Transfer pricing focuses on the conditions and pricing of transactions between related persons.

What is the arm's-length principle?

The arm's-length principle evaluates conditions between related persons against conditions that independent parties would establish in comparable circumstances.

What does a functional and comparability analysis examine?

Functional analysis examines functions, assets, risks, contractual terms, and conduct. Comparability analysis evaluates economically relevant characteristics and differences affecting an arm's-length outcome.

Does this course provide tax advice or certification?

No. It provides professional training in analytical frameworks, documentation review, and governance. Participants must use applicable law, current guidance, and qualified advice for specific cases.

Conclusion

Participants take back an International Tax and Transfer Pricing Review Pack containing treaty maps, transaction inventories, functional and comparability analysis, method-selection records, documentation evidence maps, and governance actions. The pack supports structured review, escalation, and dispute prevention without replacing case-specific professional advice.