

Transfer Pricing Documentation & CbC Reporting Training Course

OGI-1155 · 5 days · 15 CPD hours · English

Overview

The Transfer Pricing Documentation & CbC Reporting Training Course from [Institute For Oil & Gas Training](#) develops practical expertise in Transfer Pricing for oil and gas organisations managing complex cross-border transactions, related-party arrangements and multinational tax reporting obligations. The course focuses on building robust transfer pricing documentation, applying country by country reporting requirements and strengthening tax governance across international petroleum operations.

Oil and gas groups operate through interconnected legal entities, joint ventures, trading companies, service companies, holding structures, financing arrangements and operational subsidiaries across multiple jurisdictions. Transactions between related entities frequently involve crude oil, natural gas, petroleum products, technical services, management services, financing, intellectual property, equipment, procurement and shared corporate functions. Establishing and documenting appropriate transfer pricing treatment across these transactions requires a structured understanding of international tax principles, functional analysis, pricing methodologies, documentation requirements and tax authority expectations.

This course addresses the practical skills gap between transfer pricing policy design and its implementation within the finance, tax, treasury, legal and commercial functions of an oil and gas organisation. Participants develop a structured approach to identifying controlled transactions, analysing functions and risks, selecting appropriate transfer pricing methods and preparing documentation that supports the commercial substance of intercompany arrangements.

The programme provides detailed coverage of the master file and local file structure, country by country reporting, the BEPS Action Plan and the documentation expectations associated with multinational enterprises. It also examines how transfer pricing policy documentation supports consistency between group policy, legal agreements, accounting records, tax returns and operational transactions.

Particular attention is given to petroleum-sector transactions where pricing analysis involves complex commercial factors. These include intercompany financing, procurement, technical support, shared services, equipment leasing, management charges, trading arrangements and transfers of products or services between related entities. Participants examine how transaction characteristics, functions performed, assets employed and risks assumed influence the selection and application of an appropriate transfer pricing approach.

The course also explores the relationship between transfer pricing documentation and tax authority scrutiny. A well-structured documentation framework provides evidence supporting the group's approach and helps tax teams respond consistently during a transfer pricing audit. Participants learn how to organise supporting information, maintain an audit trail and identify areas that require stronger documentation before a tax authority raises questions.

Advance pricing agreement processes are addressed as part of the wider transfer pricing risk management framework. Participants examine how an advance pricing agreement establishes an agreed approach between a

taxpayer and relevant tax authority and how it fits into broader planning, documentation and dispute management considerations.

Cross-border transfer pricing disputes can involve significant financial, administrative and operational consequences. The course therefore covers adjustment and penalty exposure, dispute resolution and the mutual agreement procedure. Participants learn how transfer pricing adjustments arise, how documentation supports the taxpayer position and how tax teams coordinate information when an issue progresses into a cross-border dispute.

Institute For Oil & Gas Training delivers the course from a corporate perspective, linking international transfer pricing principles to the operational realities of petroleum businesses. The programme is designed to strengthen coordination between tax, finance, legal, commercial and operational teams while establishing a consistent approach to transfer pricing governance.

Objectives

- Understand the fundamentals of Transfer Pricing within multinational oil and gas organisations
- Identify related-party transactions requiring transfer pricing analysis and documentation
- Apply the principles used to establish and support an arm's length transfer pricing position
- Understand the structure and purpose of the master file and local file
- Develop stronger transfer pricing policy documentation for cross-border petroleum operations
- Explain the purpose and reporting structure of country by country reporting
- Understand the relevance of the BEPS Action Plan to transfer pricing documentation
- Assess the information required to support transfer pricing positions during tax authority enquiries
- Strengthen preparation for a transfer pricing audit
- Identify common sources of adjustment and penalty exposure
- Understand the role of an advance pricing agreement in transfer pricing risk management
- Examine the principles and practical considerations surrounding mutual agreement procedure
- Develop a structured approach to transfer pricing dispute resolution
- Improve coordination between tax, finance, legal, treasury, commercial and operational functions

- Strengthen internal controls over intercompany transactions and supporting documentation
- Improve the consistency between contractual arrangements, accounting records, tax positions and transfer pricing policies
- Apply transfer pricing concepts to oil and gas services, financing, procurement and trading arrangements
- Establish stronger documentation trails for significant related-party transactions
- Support management decision-making through clearer transfer pricing risk identification
- Develop practical capabilities for maintaining defensible transfer pricing documentation

Training methodology

Institute For Oil & Gas Training uses a practical corporate delivery model designed around the decisions and documentation requirements encountered by oil and gas professionals. The methodology connects technical transfer pricing principles with realistic petroleum-sector transactions, enabling participants to apply concepts directly to organisational situations.

Practical Case Studies

Participants work through case studies based on common related-party transactions in international oil and gas groups. Examples include intercompany technical services, management charges, financing arrangements, procurement activities, equipment transfers and cross-border petroleum transactions. Each case focuses on the information required to establish an appropriate transfer pricing position and document the reasoning behind it.

Documentation Exercises

Practical exercises demonstrate how information is organised within a transfer pricing documentation framework. Participants review the relationship between group-level information, entity-level information and transaction-level evidence when developing a master file and local file.

Country by Country Reporting Scenarios

Country by country reporting scenarios are used to demonstrate how multinational groups organise jurisdiction-level information and coordinate reporting responsibilities. Participants examine the importance of data consistency between tax, finance, accounting and reporting functions.

Transfer Pricing Audit Simulation

A transfer pricing audit simulation gives participants an opportunity to respond to information requests, explain pricing policies and identify supporting evidence. The exercise focuses on the practical relationship between documentation quality, internal controls and tax authority enquiries.

Group Exercises

Group exercises bring together tax, finance, commercial and legal perspectives. Participants analyse transactions from different functional viewpoints and develop consistent documentation and governance responses.

Dispute Resolution Scenarios

Real-world dispute scenarios demonstrate how a transfer pricing issue can progress from an adjustment through formal review and into international dispute resolution. Participants consider the role of evidence, documentation, communication and the mutual agreement procedure.

Applied Discussion

The delivery approach encourages participants to connect international transfer pricing principles with their organisation's existing policies, systems and controls. Discussions focus on practical implementation rather than purely theoretical interpretation.

Organisational impact

The course strengthens the organisation's ability to manage Transfer Pricing as an integrated tax governance and commercial control process. Participants return with practical methods for improving documentation, transaction review and coordination across functions.

A stronger documentation process improves the consistency of information presented across the master file, local file, tax returns, financial records, intercompany agreements and internal transfer pricing policies. This reduces the risk of contradictory explanations when transactions are reviewed internally or challenged by a tax authority.

Improved transfer pricing governance also supports earlier identification of transactions that require specialist tax review. Finance and tax teams gain a clearer framework for assessing related-party arrangements before documentation gaps develop.

The course supports more effective preparation for a transfer pricing audit. Participants learn how to organise evidence, identify relevant supporting records and explain the commercial basis of intercompany arrangements. This creates a more structured response process when tax authorities request information.

Country by country reporting processes also benefit from stronger cross-functional coordination. Finance and tax teams develop a clearer understanding of the information required for jurisdiction-level reporting and the importance of reconciling reporting data with underlying financial information.

The programme contributes to stronger adjustment and penalty risk management by encouraging systematic review of related-party transactions and documentation. Organisations can use the principles covered to establish clearer ownership of transfer pricing policies, documentation responsibilities and review controls.

The course also supports more informed decisions about advance pricing agreement strategies and dispute management. Understanding mutual agreement procedure and dispute resolution enables tax teams to approach cross-border issues through a structured process rather than treating each dispute as an isolated event.

For oil and gas groups, the benefits extend across commercial and operational functions. Better understanding of transfer pricing requirements supports stronger coordination when negotiating intercompany services, financing, procurement and trading arrangements. Legal teams gain greater awareness of the documentation implications of contractual structures, while finance teams strengthen the link between accounting treatment and tax documentation.

Management benefits from improved visibility of transfer pricing exposures across jurisdictions and business units. A consistent governance framework provides a stronger basis for monitoring significant related-party transactions and maintaining corporate tax controls.

Personal impact

Participants develop practical Transfer Pricing capabilities relevant to international oil and gas businesses. They gain a clearer understanding of how related-party transactions are analysed, documented and reviewed across multiple jurisdictions.

Tax professionals strengthen their ability to prepare and review transfer pricing documentation and to coordinate information across multinational entities. They gain greater confidence when dealing with master file and local file requirements, country by country reporting and tax authority information requests.

Finance professionals develop a stronger understanding of how intercompany transactions, financial records and transfer pricing documentation interact. This helps improve the quality and consistency of information supplied to tax and reporting teams.

Commercial and procurement professionals gain greater awareness of how intercompany contracts, service arrangements and pricing structures influence transfer pricing analysis. This supports more effective cooperation with tax and finance functions.

Legal professionals gain practical insight into the relationship between contractual arrangements and transfer pricing policy documentation. This helps them recognise documentation considerations when supporting cross-border agreements.

Treasury professionals strengthen their understanding of transfer pricing issues associated with intercompany financing and related financial arrangements.

Participants also improve their ability to communicate transfer pricing positions to senior management, auditors, tax authorities and internal stakeholders. They develop a more structured approach to explaining transaction characteristics, documentation requirements, risks and dispute management options.

The course supports professional development by strengthening a specialist capability that sits across taxation, finance, commercial management and corporate governance. Participants gain practical tools for contributing to transfer pricing reviews, audit preparation, policy development and international tax risk management.

Who should attend

Tax Managers and Tax Specialists

Designed for professionals responsible for corporate taxation, international tax, transfer pricing compliance and tax authority engagement.

Finance Managers and Financial Controllers

Relevant for finance leaders responsible for financial reporting, intercompany accounting, tax data and documentation controls.

Transfer Pricing Professionals

Built for specialists who prepare, review or manage transfer pricing policies, documentation and cross-border transactions.

Corporate Tax Directors and Heads of Tax

Supports senior tax leaders overseeing multinational tax governance, audit exposure, documentation and dispute management.

Treasury Professionals

Useful for treasury specialists managing intercompany financing, funding arrangements and related financial transactions.

Commercial Managers

Relevant for professionals involved in cross-border commercial structures, intercompany services, trading arrangements and petroleum transactions.

Procurement Professionals

Supports procurement teams involved in related-party sourcing, shared services, equipment arrangements and cross-border supply structures.

Legal and Contract Professionals

Useful for professionals responsible for intercompany agreements and contractual structures that influence transfer pricing documentation.

Internal Audit and Compliance Professionals

Provides practical knowledge for professionals reviewing tax controls, documentation processes and related-party transaction governance.

Senior Management

Relevant for executives responsible for financial governance, international operations, tax risk and corporate compliance across oil and gas businesses.

Course outline

Transfer Pricing Fundamentals for Oil and Gas

This module establishes the foundation for managing Transfer Pricing within multinational oil and gas organisations. It examines the commercial nature of related-party transactions and introduces the principles used to analyse functions, assets, risks and transaction characteristics.

Documentation, Master File and Local File

This module focuses on developing effective transfer pricing documentation and establishing a consistent evidence trail for multinational operations. Participants examine how group-level and entity-level information supports the organisation's transfer pricing position.

Country by Country Reporting and International Tax Transparency

This module examines country by country reporting and its role within multinational tax reporting and risk assessment. Participants explore the relationship between jurisdiction-level information, transfer pricing documentation and internal data governance.

Transfer Pricing Audit, Adjustments and Advance Pricing Agreements

This module focuses on tax authority scrutiny, audit preparation and proactive transfer pricing risk management. Participants examine how transfer pricing positions are challenged and how organisations prepare evidence to support their approach.

Mutual Agreement Procedure and Dispute Resolution

This module addresses the management of cross-border transfer pricing disputes after taxation authorities adopt different positions. Participants examine mutual agreement procedure and broader dispute resolution processes while developing practical approaches to evidence, communication and case management.

Scheduled dates

Dates	Venue	Format	Fee
05 - 09 Oct 2026	Abu Dhabi, United Arab Emirates	In person	£4,300
05 - 09 Oct 2026	Abuja, Nigeria	In person	£4,300
05 - 09 Oct 2026	Accra, Ghana	In person	£4,300
05 - 09 Oct 2026	Addis Ababa, Ethiopia	In person	£4,300
05 - 09 Oct 2026	Al Ain, United Arab Emirates	In person	£4,300
05 - 09 Oct 2026	Al Khobar, Saudi Arabia	In person	£4,300
05 - 09 Oct 2026	Alberta, Canada	In person	£4,300
05 - 09 Oct 2026	AlUla, Saudi Arabia	In person	£4,300

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05 - 09 Oct 2026	Amman, Jordan	In person	£4,300
05 - 09 Oct 2026	Amsterdam, Netherlands	In person	£4,300
05 - 09 Oct 2026	Athens, Greece	In person	£4,300
05 - 09 Oct 2026	Baku, Azerbaijan	In person	£4,300
05 - 09 Oct 2026	Barcelona, Spain	In person	£4,300
05 - 09 Oct 2026	Berlin, Germany	In person	£4,300
05 - 09 Oct 2026	Boston, United States	In person	£4,300
05 - 09 Oct 2026	Brussels, Belgium	In person	£4,300
05 - 09 Oct 2026	Budapest, Hungary	In person	£4,300
05 - 09 Oct 2026	Cairo, Egypt	In person	£4,300
05 - 09 Oct 2026	Cape Town, South Africa	In person	£4,300
05 - 09 Oct 2026	Casablanca, Morocco	In person	£4,300
05 - 09 Oct 2026	Dammam, Saudi Arabia	In person	£4,300
05 - 09 Oct 2026	Dhahran, Saudi Arabia	In person	£4,300
05 - 09 Oct 2026	Doha, Qatar	In person	£4,300
05 - 09 Oct 2026	Dubai, United Arab Emirates	In person	£4,300
05 - 09 Oct 2026	Edinburgh, United Kingdom	In person	£4,300
05 - 09 Oct 2026	Edmonton, Canada	In person	£4,300
05 - 09 Oct 2026	Frankfurt, Germany	In person	£4,300
05 - 09 Oct 2026	Geneva, Switzerland	In person	£4,300
05 - 09 Oct 2026	Houston, United States	In person	£4,300
05 - 09 Oct 2026	Istanbul, Turkey	In person	£4,300
05 - 09 Oct 2026	Jakarta, Indonesia	In person	£4,300
05 - 09 Oct 2026	Jeddah, Saudi Arabia	In person	£4,300
05 - 09 Oct 2026	Jubail, Saudi Arabia	In person	£4,300
05 - 09 Oct 2026	Khamis Mushait, Saudi Arabia	In person	£4,300

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05 - 09 Oct 2026	Kigali, Rwanda	In person	£4,300
05 - 09 Oct 2026	Kuala Lumpur, Malaysia	In person	£4,300
05 - 09 Oct 2026	Lisbon, Portugal	In person	£4,300
05 - 09 Oct 2026	Liverpool, United Kingdom	In person	£4,300
05 - 09 Oct 2026	London, United Kingdom	In person	£4,300
05 - 09 Oct 2026	Los Angeles, United States	In person	£4,300
05 - 09 Oct 2026	Luanda, Angola	In person	£4,300
05 - 09 Oct 2026	Madrid, Spain	In person	£4,300
05 - 09 Oct 2026	Manama, Bahrain	In person	£4,300
05 - 09 Oct 2026	Marbella, Spain	In person	£4,300
05 - 09 Oct 2026	Marrakech, Morocco	In person	£4,300
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05 - 09 Oct 2026	New York, United States	In person	£4,300
05 - 09 Oct 2026	Nice, France	In person	£4,300
05 - 09 Oct 2026	Nouakchott, Mauritania	In person	£4,300
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05 - 09 Oct 2026	Prague, Czech Republic	In person	£4,300
05 - 09 Oct 2026	Pretoria, South Africa	In person	£4,300
05 - 09 Oct 2026	Riyadh, Saudi Arabia	In person	£4,300
05 - 09 Oct 2026	Rome, Italy	In person	£4,300

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05 - 09 Oct 2026	Sharm El Sheikh, Egypt	In person	£4,300
05 - 09 Oct 2026	Singapore	In person	£4,300
05 - 09 Oct 2026	Stockholm, Sweden	In person	£4,300
05 - 09 Oct 2026	Tokyo, Japan	In person	£4,300
05 - 09 Oct 2026	Toronto, Canada	In person	£4,300
05 - 09 Oct 2026	Tromso, Norway	In person	£4,300
05 - 09 Oct 2026	Vienna, Austria	In person	£4,300
05 - 09 Oct 2026	Zagreb, Croatia	In person	£4,300
05 - 09 Oct 2026	Zurich, Switzerland	In person	£4,300
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04 - 08 Oct 2027	Doha, Qatar	In person	£4,300
04 - 08 Oct 2027	Dubai, United Arab Emirates	In person	£4,300
04 - 08 Oct 2027	Edinburgh, United Kingdom	In person	£4,300
04 - 08 Oct 2027	Edmonton, Canada	In person	£4,300
04 - 08 Oct 2027	Frankfurt, Germany	In person	£4,300
04 - 08 Oct 2027	Geneva, Switzerland	In person	£4,300
04 - 08 Oct 2027	Houston, United States	In person	£4,300

Dates	Venue	Format	Fee
04 - 08 Oct 2027	Istanbul, Turkey	In person	£4,300
04 - 08 Oct 2027	Jakarta, Indonesia	In person	£4,300
04 - 08 Oct 2027	Jeddah, Saudi Arabia	In person	£4,300
04 - 08 Oct 2027	Jubail, Saudi Arabia	In person	£4,300
04 - 08 Oct 2027	Khamis Mushait, Saudi Arabia	In person	£4,300
04 - 08 Oct 2027	Kigali, Rwanda	In person	£4,300
04 - 08 Oct 2027	Kuala Lumpur, Malaysia	In person	£4,300
04 - 08 Oct 2027	Lisbon, Portugal	In person	£4,300
04 - 08 Oct 2027	Liverpool, United Kingdom	In person	£4,300
04 - 08 Oct 2027	London, United Kingdom	In person	£4,300
04 - 08 Oct 2027	Los Angeles, United States	In person	£4,300
04 - 08 Oct 2027	Luanda, Angola	In person	£4,300
04 - 08 Oct 2027	Madrid, Spain	In person	£4,300
04 - 08 Oct 2027	Manama, Bahrain	In person	£4,300
04 - 08 Oct 2027	Marbella, Spain	In person	£4,300
04 - 08 Oct 2027	Marrakech, Morocco	In person	£4,300
04 - 08 Oct 2027	Miami, United States	In person	£4,300
04 - 08 Oct 2027	Milan, Italy	In person	£4,300
04 - 08 Oct 2027	Munich, Germany	In person	£4,300
04 - 08 Oct 2027	Muscat, Oman	In person	£4,300
04 - 08 Oct 2027	Nairobi, Kenya	In person	£4,300
04 - 08 Oct 2027	New York, United States	In person	£4,300
04 - 08 Oct 2027	Nice, France	In person	£4,300
04 - 08 Oct 2027	Nouakchott, Mauritania	In person	£4,300
04 - 08 Oct 2027	Oslo, Norway	In person	£4,300
04 - 08 Oct 2027	Paris, France	In person	£4,300

Dates	Venue	Format	Fee
04 - 08 Oct 2027	Port Louis, Mauritius	In person	£4,300
04 - 08 Oct 2027	Prague, Czech Republic	In person	£4,300
04 - 08 Oct 2027	Pretoria, South Africa	In person	£4,300
04 - 08 Oct 2027	Riyadh, Saudi Arabia	In person	£4,300
04 - 08 Oct 2027	Rome, Italy	In person	£4,300
04 - 08 Oct 2027	Sarajevo, Bosnia and Herzegovina	In person	£4,300
04 - 08 Oct 2027	Sharm El Sheikh, Egypt	In person	£4,300
04 - 08 Oct 2027	Singapore	In person	£4,300
04 - 08 Oct 2027	Stockholm, Sweden	In person	£4,300
04 - 08 Oct 2027	Tokyo, Japan	In person	£4,300
04 - 08 Oct 2027	Toronto, Canada	In person	£4,300
04 - 08 Oct 2027	Tromso, Norway	In person	£4,300
04 - 08 Oct 2027	Vienna, Austria	In person	£4,300
04 - 08 Oct 2027	Zagreb, Croatia	In person	£4,300
04 - 08 Oct 2027	Zurich, Switzerland	In person	£4,300
04 - 08 Oct 2027	Online, Virtual	Online	£4,300

Certificate

Attendees receive a Certificate of Completion from Institute For Oil & Gas Training upon successfully finishing the course. The certificate confirms participation in the full programme and requires attendance throughout the scheduled course.