

Transfer Pricing for Oil & Gas Groups Training Course

OGI-1144 · 5 days · 15 CPD hours · English

Overview

The Transfer Pricing for Oil & Gas Groups Training Course from [Institute For Oil & Gas Training](#) develops practical Transfer Pricing capabilities for professionals managing cross-border tax, finance, commercial, and related party transactions across oil and gas groups. Transfer Pricing is a critical component of petroleum taxation because upstream, midstream, downstream, trading, and shared-service structures frequently involve transactions between entities operating across different jurisdictions.

Oil and gas groups operate through complex corporate structures that involve exploration and production companies, holding entities, service companies, trading businesses, procurement centres, financing entities, and technical support functions. These structures create significant volumes of intercompany transactions, including crude oil and gas sales, equipment transfers, technical services, management support, financing, intellectual property arrangements, procurement services, and intra-group services. Establishing defensible pricing for these transactions requires a structured understanding of the arm's length principle, economic analysis, functional analysis, comparability, and appropriate transfer pricing methods.

This course addresses the practical skills gap between general tax knowledge and the detailed analysis required to manage petroleum-related Transfer Pricing issues. Participants examine how to identify related party transactions, understand the functions performed by each group entity, assess risks and assets, select appropriate methodologies, evaluate comparable transactions, and document conclusions that withstand professional review.

The programme places particular emphasis on the commercial realities of oil and gas operations. Commodity pricing, market conditions, transportation arrangements, production characteristics, contractual terms, refining activities, trading structures, and specialist technical services all influence the economic analysis of intercompany transactions. Participants learn how these factors affect the selection and application of transfer pricing methods.

The arm's length principle provides the central framework for analysing whether related party transactions reflect conditions that independent parties would accept. The course examines how this principle is applied to petroleum transactions and group arrangements through practical examples and structured analysis. Participants explore the comparable uncontrolled price method, cost plus method, and transactional net margin method, including the circumstances in which each method provides relevant economic evidence.

Functional analysis is another central component of the course. Participants assess the functions performed, assets used, and risks assumed by entities within an oil and gas group. This analysis provides the foundation for understanding the economic character of an entity and selecting an appropriate transfer pricing approach.

The programme also develops practical competence in comparability adjustments and benchmarking study techniques. Participants learn how to assess differences between controlled and uncontrolled transactions, identify economically relevant characteristics, and interpret comparable information in the context of petroleum operations.

Particular attention is given to intra-group services because oil and gas groups frequently centralise finance, procurement, information technology, human resources, engineering, legal, technical, and management functions. Participants examine how service arrangements should be analysed, how the benefit received by the recipient is assessed, and how appropriate pricing evidence is developed.

The course also addresses documentation, governance, tax authority scrutiny, and internal controls. Participants learn how transfer pricing policies connect with tax reporting, financial data, contracts, management information, and intercompany accounting records. This integrated perspective helps organisations establish more consistent processes for identifying and managing transfer pricing exposure.

Institute For Oil & Gas Training delivers the course for professionals who require an industry-focused understanding of petroleum Transfer Pricing rather than a purely theoretical treatment. The programme connects tax principles with operational transactions and commercial structures so that participants can apply the concepts within real oil and gas group environments.

Objectives

- Understand the role of Transfer Pricing within international oil and gas groups
- Apply the arm's length principle to related party transactions
- Analyse the economic characteristics of petroleum transactions
- Conduct structured functional analysis covering functions, assets, and risks
- Identify the factors that influence transfer pricing method selection
- Apply the comparable uncontrolled price method to relevant commodity transactions
- Understand the practical application of the cost plus method
- Apply the transactional net margin method to suitable controlled transactions
- Evaluate comparability factors affecting petroleum-related transactions
- Understand the purpose and application of comparability adjustments
- Develop practical approaches to benchmarking study analysis
- Assess pricing considerations for intra-group services
- Review intercompany agreements from a transfer pricing perspective

- Connect transfer pricing analysis with financial and tax reporting processes
- Improve the quality and consistency of transfer pricing documentation
- Identify common areas of transfer pricing exposure within petroleum groups
- Strengthen internal controls over intercompany transactions
- Improve communication between tax, finance, commercial, legal, and operational teams
- Support more consistent governance of cross-border related party transactions
- Develop practical skills for reviewing transfer pricing positions within oil and gas organisations

Training methodology

Institute For Oil & Gas Training uses a practical, corporate delivery model designed around the types of transactions encountered within international oil and gas groups. The methodology combines structured technical briefings with case studies, analytical exercises, group discussions, transaction reviews, and realistic petroleum scenarios.

Case studies demonstrate how Transfer Pricing analysis applies to crude oil sales, natural gas transactions, technical support arrangements, procurement services, management charges, financing structures, and other intercompany dealings. Participants work through the commercial facts before considering the appropriate transfer pricing methodology.

Functional analysis exercises require participants to identify functions, assets, and risks across related entities. These exercises demonstrate how apparently similar entities can have different economic profiles because of differences in decision-making authority, operational responsibility, assets, contractual arrangements, and risk allocation.

Method selection exercises focus on the comparable uncontrolled price method, cost plus method, and transactional net margin method. Participants examine transaction characteristics, available information, and economic circumstances before determining which methodology provides the most relevant evidence.

Benchmarking study exercises demonstrate how comparable companies and transactions are assessed. Participants consider the importance of business activities, geography, market conditions, functions performed, risk profiles, and financial information when reviewing potential comparables.

Practical scenarios also address comparability adjustments. Participants examine situations where differences between controlled and uncontrolled transactions require analytical consideration. The exercises help develop a disciplined approach to identifying economically significant differences rather than relying solely on numerical comparisons.

Group exercises focus on intra-group services. Participants examine whether services provide an identifiable benefit, how service activities should be characterised, and how pricing mechanisms relate to the functions actually

performed.

The course also incorporates documentation exercises. Participants review transaction information, contractual arrangements, financial data, and supporting analysis to understand how a coherent transfer pricing position is constructed.

Real-world scenarios connect tax analysis with commercial decision-making. This helps finance, tax, treasury, legal, commercial, and operational professionals understand how Transfer Pricing interacts with broader corporate governance and petroleum business structures.

Organisational impact

A structured Transfer Pricing capability supports stronger governance across international oil and gas groups. Organisations benefit from clearer processes for identifying related party transactions and evaluating whether intercompany pricing arrangements are supported by appropriate economic analysis.

The course strengthens consistency between tax, finance, commercial, and operational functions. Participants understand the importance of aligning contractual arrangements, transaction data, accounting records, and transfer pricing policies. This reduces the risk of fragmented approaches across business units and jurisdictions.

Improved functional analysis helps organisations understand how value-generating activities are distributed across group entities. This supports more disciplined assessment of functions performed, assets deployed, and risks assumed when establishing or reviewing intercompany arrangements.

The programme also strengthens the quality of transfer pricing method selection. A clearer understanding of the comparable uncontrolled price method, cost plus method, and transactional net margin method helps professionals evaluate which approach aligns with the characteristics and available evidence for a particular transaction.

For commodity-related transactions, the course provides a framework for examining economically relevant factors such as product characteristics, contractual conditions, market circumstances, volumes, transportation arrangements, and geographic considerations. This supports more robust analysis of intercompany petroleum transactions.

Benchmarking study capability provides organisations with stronger processes for assessing economic evidence. Participants gain a more structured approach to reviewing comparables, identifying relevant differences, and understanding the importance of comparability adjustments.

The treatment of intra-group services also becomes more systematic. Organisations can establish clearer processes for reviewing management, technical, procurement, financial, administrative, and other shared services. This supports better alignment between service descriptions, benefits received, cost bases, allocation mechanisms, and pricing analysis.

The course supports compliance governance by improving awareness of documentation requirements and internal evidence. Better-maintained transaction records, contracts, calculations, and analytical support create a stronger foundation for responding to tax authority enquiries.

The programme also supports operational efficiency by improving communication between departments. When commercial and operational teams understand the transfer pricing implications of transaction structures, they can

provide more relevant information to tax and finance teams during reviews and planning processes.

Personal impact

Participants develop a practical understanding of Transfer Pricing that applies directly to international oil and gas operations. They gain greater confidence when reviewing intercompany arrangements, tax analysis, financial information, and supporting documentation.

Tax professionals strengthen their ability to analyse petroleum transactions and select appropriate methodologies. Finance professionals improve their understanding of how intercompany accounting data supports transfer pricing analysis.

Commercial professionals gain greater awareness of the pricing implications of cross-border transactions. Legal professionals develop a stronger understanding of how contractual terms interact with economic analysis and transfer pricing positions.

Participants improve their ability to perform functional analysis by systematically reviewing functions, assets, and risks. They also develop stronger analytical skills for assessing comparability and determining when comparability adjustments require consideration.

The course strengthens practical benchmarking skills. Participants learn how to assess comparable information and interpret financial indicators within the context of the underlying business activities.

Professionals responsible for intra-group services gain a clearer framework for evaluating service arrangements and the economic benefit provided to recipient entities. This supports more informed discussions about service charges, cost allocation, and documentation.

Participants also improve their ability to communicate transfer pricing matters to senior management. They learn to connect technical tax analysis with commercial structures, financial outcomes, governance requirements, and organisational risk management.

Who should attend

Tax and Transfer Pricing Professionals

Designed for professionals responsible for corporate taxation, international taxation, transfer pricing policies, tax compliance, and intercompany pricing within oil and gas groups.

Finance and Accounting Managers

Relevant for finance leaders who review intercompany accounting, management charges, commodity transactions, financial reporting, and tax-related financial information.

Petroleum Commercial Professionals

Suitable for commercial managers involved in crude oil, natural gas, LNG, products, trading, procurement, sales, and cross-border contractual arrangements.

Treasury Professionals

Useful for treasury specialists reviewing intercompany financing, cash movements, guarantees, funding arrangements, and related financial transactions.

Legal and Contract Professionals

Relevant for legal and contracts teams responsible for drafting or reviewing intercompany agreements and commercial arrangements.

Tax Managers and Heads of Tax

Designed for senior tax professionals overseeing tax governance, transfer pricing policies, audits, documentation, and relationships between operational entities and corporate functions.

Financial Controllers

Suitable for controllers responsible for financial data, intercompany accounting, reconciliations, reporting, and controls supporting transfer pricing analysis.

Internal Audit and Compliance Professionals

Useful for professionals reviewing governance, documentation, controls, and compliance processes associated with related party transactions.

Business Unit and Commercial Managers

Relevant for managers responsible for operational or commercial entities participating in cross-border group transactions and shared-service arrangements.

Senior Management

Suitable for executives who require a practical understanding of transfer pricing exposure, governance, documentation, and the commercial implications of intercompany arrangements.

Course outline

Transfer Pricing Foundations for Oil and Gas Groups

This module establishes the commercial and tax foundations of Transfer Pricing within international petroleum organisations. It examines why related party transactions require systematic analysis and how the arm's length principle provides the basis for evaluating intercompany arrangements.

Functional Analysis and Transfer Pricing Method Selection

This module focuses on the analytical process used to understand the economic character of related entities and transactions. Participants examine functions, assets, and risks before assessing appropriate transfer pricing methodologies.

Petroleum Transactions, Comparability and Benchmarking

This module examines the economic analysis of petroleum transactions and the process of establishing reliable comparable evidence. Participants focus on commodity transactions, market conditions, comparable information, and comparability adjustments.

Intra-Group Services, Financing and Cost Allocation

This module addresses the transfer pricing treatment of services and financial arrangements within oil and gas groups. It focuses on determining the nature of services, evaluating recipient benefits, analysing cost bases, and developing defensible allocation and pricing approaches.

Transfer Pricing Documentation, Risk Management and Governance

This module brings together the analytical concepts covered throughout the course and focuses on documentation, governance, review processes, and practical implementation. Participants examine how organisations maintain consistent transfer pricing positions across multiple jurisdictions and business units.

Scheduled dates

Dates	Venue	Format	Fee
05 - 09 Oct 2026	Abu Dhabi, United Arab Emirates	In person	£3,600
05 - 09 Oct 2026	Abuja, Nigeria	In person	£3,600
05 - 09 Oct 2026	Accra, Ghana	In person	£3,600
05 - 09 Oct 2026	Addis Ababa, Ethiopia	In person	£3,600
05 - 09 Oct 2026	Al Ain, United Arab Emirates	In person	£3,600
05 - 09 Oct 2026	Al Khobar, Saudi Arabia	In person	£3,600
05 - 09 Oct 2026	Alberta, Canada	In person	£3,600
05 - 09 Oct 2026	AlUla, Saudi Arabia	In person	£3,600
05 - 09 Oct 2026	Amman, Jordan	In person	£3,600
05 - 09 Oct 2026	Amsterdam, Netherlands	In person	£3,600
05 - 09 Oct 2026	Athens, Greece	In person	£3,600
05 - 09 Oct 2026	Baku, Azerbaijan	In person	£3,600
05 - 09 Oct 2026	Barcelona, Spain	In person	£3,600
05 - 09 Oct 2026	Berlin, Germany	In person	£3,600
05 - 09 Oct 2026	Boston, United States	In person	£3,600

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05 - 09 Oct 2026	Brussels, Belgium	In person	£3,600
05 - 09 Oct 2026	Budapest, Hungary	In person	£3,600
05 - 09 Oct 2026	Cairo, Egypt	In person	£3,600
05 - 09 Oct 2026	Cape Town, South Africa	In person	£3,600
05 - 09 Oct 2026	Casablanca, Morocco	In person	£3,600
05 - 09 Oct 2026	Dammam, Saudi Arabia	In person	£3,600
05 - 09 Oct 2026	Dhahran, Saudi Arabia	In person	£3,600
05 - 09 Oct 2026	Doha, Qatar	In person	£3,600
05 - 09 Oct 2026	Dubai, United Arab Emirates	In person	£3,600
05 - 09 Oct 2026	Edinburgh, United Kingdom	In person	£3,600
05 - 09 Oct 2026	Edmonton, Canada	In person	£3,600
05 - 09 Oct 2026	Frankfurt, Germany	In person	£3,600
05 - 09 Oct 2026	Geneva, Switzerland	In person	£3,600
05 - 09 Oct 2026	Houston, United States	In person	£3,600
05 - 09 Oct 2026	Istanbul, Turkey	In person	£3,600
05 - 09 Oct 2026	Jakarta, Indonesia	In person	£3,600
05 - 09 Oct 2026	Jeddah, Saudi Arabia	In person	£3,600
05 - 09 Oct 2026	Jubail, Saudi Arabia	In person	£3,600
05 - 09 Oct 2026	Khamis Mushait, Saudi Arabia	In person	£3,600
05 - 09 Oct 2026	Kigali, Rwanda	In person	£3,600
05 - 09 Oct 2026	Kuala Lumpur, Malaysia	In person	£3,600
05 - 09 Oct 2026	Lisbon, Portugal	In person	£3,600
05 - 09 Oct 2026	Liverpool, United Kingdom	In person	£3,600
05 - 09 Oct 2026	London, United Kingdom	In person	£3,600
05 - 09 Oct 2026	Los Angeles, United States	In person	£3,600
05 - 09 Oct 2026	Luanda, Angola	In person	£3,600

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05 - 09 Oct 2026	Madrid, Spain	In person	£3,600
05 - 09 Oct 2026	Manama, Bahrain	In person	£3,600
05 - 09 Oct 2026	Marbella, Spain	In person	£3,600
05 - 09 Oct 2026	Marrakech, Morocco	In person	£3,600
05 - 09 Oct 2026	Miami, United States	In person	£3,600
05 - 09 Oct 2026	Milan, Italy	In person	£3,600
05 - 09 Oct 2026	Munich, Germany	In person	£3,600
05 - 09 Oct 2026	Muscat, Oman	In person	£3,600
05 - 09 Oct 2026	Nairobi, Kenya	In person	£3,600
05 - 09 Oct 2026	New York, United States	In person	£3,600
05 - 09 Oct 2026	Nice, France	In person	£3,600
05 - 09 Oct 2026	Nouakchott, Mauritania	In person	£3,600
05 - 09 Oct 2026	Oslo, Norway	In person	£3,600
05 - 09 Oct 2026	Paris, France	In person	£3,600
05 - 09 Oct 2026	Port Louis, Mauritius	In person	£3,600
05 - 09 Oct 2026	Prague, Czech Republic	In person	£3,600
05 - 09 Oct 2026	Pretoria, South Africa	In person	£3,600
05 - 09 Oct 2026	Riyadh, Saudi Arabia	In person	£3,600
05 - 09 Oct 2026	Rome, Italy	In person	£3,600
05 - 09 Oct 2026	Sarajevo, Bosnia and Herzegovina	In person	£3,600
05 - 09 Oct 2026	Sharm El Sheikh, Egypt	In person	£3,600
05 - 09 Oct 2026	Singapore	In person	£3,600
05 - 09 Oct 2026	Stockholm, Sweden	In person	£3,600
05 - 09 Oct 2026	Tokyo, Japan	In person	£3,600
05 - 09 Oct 2026	Toronto, Canada	In person	£3,600
05 - 09 Oct 2026	Tromso, Norway	In person	£3,600

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05 - 09 Oct 2026	Vienna, Austria	In person	£3,600
05 - 09 Oct 2026	Zagreb, Croatia	In person	£3,600
05 - 09 Oct 2026	Zurich, Switzerland	In person	£3,600
05 - 09 Oct 2026	Online, Virtual	Online	£3,600
01 - 05 Feb 2027	Abu Dhabi, United Arab Emirates	In person	£3,600
01 - 05 Feb 2027	Abuja, Nigeria	In person	£3,600
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01 - 05 Feb 2027	Dammam, Saudi Arabia	In person	£3,600
01 - 05 Feb 2027	Dhahran, Saudi Arabia	In person	£3,600

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04 - 08 Oct 2027	Addis Ababa, Ethiopia	In person	£3,600
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04 - 08 Oct 2027	Alberta, Canada	In person	£3,600
04 - 08 Oct 2027	AlUla, Saudi Arabia	In person	£3,600
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04 - 08 Oct 2027	Dammam, Saudi Arabia	In person	£3,600
04 - 08 Oct 2027	Dhahran, Saudi Arabia	In person	£3,600
04 - 08 Oct 2027	Doha, Qatar	In person	£3,600
04 - 08 Oct 2027	Dubai, United Arab Emirates	In person	£3,600
04 - 08 Oct 2027	Edinburgh, United Kingdom	In person	£3,600
04 - 08 Oct 2027	Edmonton, Canada	In person	£3,600
04 - 08 Oct 2027	Frankfurt, Germany	In person	£3,600
04 - 08 Oct 2027	Geneva, Switzerland	In person	£3,600
04 - 08 Oct 2027	Houston, United States	In person	£3,600
04 - 08 Oct 2027	Istanbul, Turkey	In person	£3,600
04 - 08 Oct 2027	Jakarta, Indonesia	In person	£3,600
04 - 08 Oct 2027	Jeddah, Saudi Arabia	In person	£3,600
04 - 08 Oct 2027	Jubail, Saudi Arabia	In person	£3,600
04 - 08 Oct 2027	Khamis Mushait, Saudi Arabia	In person	£3,600
04 - 08 Oct 2027	Kigali, Rwanda	In person	£3,600
04 - 08 Oct 2027	Kuala Lumpur, Malaysia	In person	£3,600

Dates	Venue	Format	Fee
04 - 08 Oct 2027	Lisbon, Portugal	In person	£3,600
04 - 08 Oct 2027	Liverpool, United Kingdom	In person	£3,600
04 - 08 Oct 2027	London, United Kingdom	In person	£3,600
04 - 08 Oct 2027	Los Angeles, United States	In person	£3,600
04 - 08 Oct 2027	Luanda, Angola	In person	£3,600
04 - 08 Oct 2027	Madrid, Spain	In person	£3,600
04 - 08 Oct 2027	Manama, Bahrain	In person	£3,600
04 - 08 Oct 2027	Marbella, Spain	In person	£3,600
04 - 08 Oct 2027	Marrakech, Morocco	In person	£3,600
04 - 08 Oct 2027	Miami, United States	In person	£3,600
04 - 08 Oct 2027	Milan, Italy	In person	£3,600
04 - 08 Oct 2027	Munich, Germany	In person	£3,600
04 - 08 Oct 2027	Muscat, Oman	In person	£3,600
04 - 08 Oct 2027	Nairobi, Kenya	In person	£3,600
04 - 08 Oct 2027	New York, United States	In person	£3,600
04 - 08 Oct 2027	Nice, France	In person	£3,600
04 - 08 Oct 2027	Nouakchott, Mauritania	In person	£3,600
04 - 08 Oct 2027	Oslo, Norway	In person	£3,600
04 - 08 Oct 2027	Paris, France	In person	£3,600
04 - 08 Oct 2027	Port Louis, Mauritius	In person	£3,600
04 - 08 Oct 2027	Prague, Czech Republic	In person	£3,600
04 - 08 Oct 2027	Pretoria, South Africa	In person	£3,600
04 - 08 Oct 2027	Riyadh, Saudi Arabia	In person	£3,600
04 - 08 Oct 2027	Rome, Italy	In person	£3,600
04 - 08 Oct 2027	Sarajevo, Bosnia and Herzegovina	In person	£3,600
04 - 08 Oct 2027	Sharm El Sheikh, Egypt	In person	£3,600

Dates	Venue	Format	Fee
04 - 08 Oct 2027	Singapore	In person	£3,600
04 - 08 Oct 2027	Stockholm, Sweden	In person	£3,600
04 - 08 Oct 2027	Tokyo, Japan	In person	£3,600
04 - 08 Oct 2027	Toronto, Canada	In person	£3,600
04 - 08 Oct 2027	Tromso, Norway	In person	£3,600
04 - 08 Oct 2027	Vienna, Austria	In person	£3,600
04 - 08 Oct 2027	Zagreb, Croatia	In person	£3,600
04 - 08 Oct 2027	Zurich, Switzerland	In person	£3,600
04 - 08 Oct 2027	Online, Virtual	Online	£3,600

Certificate

Attendees receive a Certificate of Completion from Institute For Oil & Gas Training upon successfully finishing the course. The certificate confirms participation and completion of the programme, subject to meeting the course attendance requirement.