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**Middlesex  
University  
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**INTERNATIONAL INSTITUTE  
FOR TAX AND FINANCE**

# **POSTGRADUATE DIPLOMA IN TRANSFER PRICING BY DISTANCE LEARNING**

**AWARDED BY MIDDLESEX  
UNIVERSITY LONDON**

**[www.informaconnect.com/pg-diploma-in-transfer-pricing](http://www.informaconnect.com/pg-diploma-in-transfer-pricing)**

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# ABOUT THIS COURSE

Transfer pricing has become a major problem with international multinationals, particularly in developing countries. Revenue services are becoming more skilled in the area of transfer pricing, and every year sees a dramatic increase in companies being required to engage with revenue services on transfer pricing.

This course, developed by leading international transfer pricing specialists, at both advisory and in-house level, will provide a firm grounding on all must-know Transfer Pricing areas. Upon completion, students will be fully equipped to confidently pursue a career in international taxation.

This is a Postgraduate Diploma awarded by Middlesex University and operated by Informa Connect. IITF will create the content and provide lecturing and marking services via the Informa Connect Learning Virtual platform.

## COURSE HIGHLIGHTS



Delivered by experts in the field – Course Director:  
**Dr Daniel Erasmus**



Duration: **12 months**



Delivery:  
**Distance learning**



Award:  
**Postgraduate Diploma**

## KEY INFORMATION



### When does it start and how long is the course?

- Two academic intakes a year: April and September
- Duration: 12 months
- \* [Please go online to see the next available start date.](#)



### What are the entry requirements?

- An undergraduate degree in Law, Accounting, Finance or Economics.
- Applications may also be accepted by candidates who have achieved a comparative academic level through their work experience and full details should be supplied in your personal statement and reference.
- If English is not your first language, an IELTS score of 6.5 or a TOEFL score of 575 or equivalent is normally required (see website for full information)



### How is the course assessed?

There are 2 assessment components per module:

- 3 short tutorial questions throughout each module
- 1 written assignment per module

There is also 1 overall written course assignment at the end of the course.

### How much does it cost?

Please go online to

[www.informconnect.com/pg-diploma-in-transfer-pricing/purchase/select-course-option](http://www.informconnect.com/pg-diploma-in-transfer-pricing/purchase/select-course-option)

and see the FAQ page for full details. An interest-free instalment plan is available. Please contact us for more details.



# WHO SHOULD TAKE THIS COURSE?

This course has been specifically designed as the first full postgraduate diploma in Transfer Pricing. It is aimed at in-house tax and transfer pricing specialists from multinational companies, tax practitioners in private practice and revenue authorities.

## WHAT YOU WILL LEARN

Benefit from a highly relevant programme that will:

- ✓ Provide a detailed understanding into the Transfer Pricing aspect of the OECD BEPS initiatives
- ✓ Produce an in-depth and practical understanding of Transfer Pricing
- ✓ Examine the latest policy developments and tax treatment of complex Transfer Pricing transactions that organisations need to deal with in an increasingly demanding regulatory environment
- ✓ Tackle key issues shaping the transfer pricing world today

The central aim of this course, is to provide a comprehensive grounding in all aspects of transfer pricing. The modules address the important issues within the sector, drawing out key points to ensure you gain a thorough understanding of the topics before completing your final assignment.

## IDEAL FOR

- ✓ Transfer Pricing Managers
- ✓ Finance Directors
- ✓ Group Tax Directors
- ✓ Heads of Corporate Tax
- ✓ Tax Accountants
- ✓ Lawyers
- ✓ Heads of Transfer Pricing
- ✓ Senior Tax Managers
- ✓ Senior Executives
- ✓ Accountants



I have no hesitation in recommending this course to others. ”

Dr E. Mvundla – ZIMRA

Group bookings may qualify for a discounted enrolment fee.

Click here to find out more.



Middlesex  
University  
London

- Second highest modern university in London (London Complete University Guide)
- Top 10 Transnational University in the world (HESA 2018)
- Silver Teaching Excellence Framework Award (TEF) for high-quality teaching




# COURSE DIRECTOR



**Course Director,**  
**Dr Daniel N Erasmus (BA (law)**  
**BProc H Dip Tax Ph.D Adv Dip**  
**Transfer Pricing EA US Tax Court**  
**Practitioner and NTPI Fellow)**

Dr. Daniel N. Erasmus focuses on tax controversy with a general emphasis on complex domestic and international issues and a particular emphasis on transfer pricing issues. His transfer pricing experience includes extensive involvement with the identification, valuation, and movement of intangible property in a variety of industries. His more than 28 years' experience includes all aspects of income tax planning, Revenue Service administrative proceedings, and tax litigation. Daniel holds a PhD in tax and constitutional law, is an international tax adjunct professor, and author of numerous tax textbooks.




Excellent course and  
tutors – this course makes  
a rather complex area  
more accessible 

**J Robinson – Ericsson**



Thanks very much for your support, these  
results would not have been achieved  
without your unwavering support and  
impeccable organisational skills.

**A. Mboweni – SARS** 

## HOW YOU WILL LEARN

- ✓ This is a distance learning course and all notes and lecture material will be made available via the internet through the KNet365 virtual learning platform.
- ✓ Pre-recorded lectures will be conducted on the internet via our online classroom every week, followed a week later by a live online tutorial in a fully interactive classroom to give students the opportunity to ask questions.
- ✓ There are two books which students will need as part of the course (PWC Guide to Transfer Pricing and OECD Transfer Pricing Guidelines) and electronic versions of these books will be available for students through the KNet365 virtual learning platform

# SYLLABUS

## MODULE 1 TP LEGAL FRAMEWORK

- Introduction to Transfer Pricing and its legal frameworks
- Establishing a basic Transfer Pricing policy
- Examples of Transfer Pricing regulations in a developed and a developing country
- Looking at Transfer Pricing Case Law
- Arm's Length Principles in Transfer Pricing
- Transfer Pricing Methods Introduction

This module lays the foundation for the rest of the course and will provide you with an overview of the tools needed to assess the legal environment of a specific jurisdiction when applying the transfer pricing principles.

## MODULE 2 SHARING OF CORPORATE RESOURCES

- Transfer Pricing Methods
- Comparability Analysis
- Intra-Group Services

This module will ensure that you can choose and understand the appropriate TP method for controlled transactions, perform a comparability analysis and determine and arm's length charge for Intra-Group Services. You will understand how each method works, the specific conditions for a method to be applied and be able to perform the calculations required for each method. You will also understand fully the comparability analysis and study intra-group services in regard to the application of OECD guidelines.

## MODULE 3 TRANSFER PRICING SPECIALISED AREAS

- Intangibles
- Cost Contribution Arrangements
- Financing

The aim of this module is to ensure that you understand how the more complex types of TP transactions are to be identified, treated, analysed and priced in terms of OECD guidelines. The module will provide guidance on how to identify Intangible transactions; an understanding of cost contribution arrangements; the application of the arm's length principle to such arrangements and the various types of financial transactions in a TP environment.

## MODULE 4 TP COMPLIANCE AND DISPUTE RESOLUTION

- Business Restructuring
- Permanent Establishments
- Compliance
- Dispute Resolution

The aim of this module is to ensure that you understand how the more complex types of TP transactions are to be identified, treated, analysed and priced in terms of OECD guidelines, specifically for business restructuring and permanent establishments.

## ORGANISATIONS THAT HAVE ALREADY BENEFITED FROM THE PROGRAMME INCLUDE:

Deloitte

Thomson Reuters

Rödl & Partner

Dimension Data

CMS Bureau Francis Lefebvre

Maroc

Siemens Ltd

Strombeck Pieterse Attorneys Inc

DSC Attorneys

BDO Advisory Pty Ltd

Barclays Africa Group

South African Revenue Service

Standard Bank of South Africa

Danfoss A/S

Botswana Unified Revenue Service

Zimbabwe Revenue Authority

Rymco Pty Ltd

Grupo Consultor EFE

Seed Co Limited

Meikles Hospitality Private Limited

PKF Taxation Services Ltd

RK Tax Solutions

Leonteq Securities AG

Infor

Danny Darussalam Tax Center

Premioserve

SoftwareONE India Private Limited

CAC International

Ernst & Young Services Ltd

Danfoss

BDO Advisory Pty Ltd

BDO Puerto Rico

General Motors LLC

MTN Ghana

MultiChoice

Sasol

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# WHO WE ARE



**Middlesex  
University  
London**

Middlesex University is a large London based university with a history in higher education dating from 1878. In 1992 it was granted the Royal Charter becoming a world-class university, with campuses in London, Dubai, Malta and Mauritius. The institution offers a broad range of courses through three academic faculties: Faculty of Arts and Creative Industries; Faculty of Professional and Social Sciences - which includes the Business School; and the Faculty of Science and Technology.

Over 34,000 students are studying on Middlesex courses worldwide, both at their campuses and also with partner institutions, making the university one of the largest providers of British higher education to international students.



**INTERNATIONAL INSTITUTE  
FOR TAX AND FINANCE**

IITF is an international tax consultancy with a faculty of globally recognised transfer pricing experts. IITF specialises in delivering international tax programmes and workshops both face to face and online. IITF creates content and provides lecturing and marking services via the IIR Ltd (KNect365 Learning) Virtual Learning Platform (VLE).



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## ABOUT INFORMA CONNECT

We are part of the Informa Connect division of Informa PLC, a FTSE 100 company with a network of Internationally respected brands that connect specialists through events, training, intelligence and scholarly publishing. Our purpose is to connect our customers to information and people that help them know more, do more and be more. No other company in the world helps more people share professional knowledge or make business connections.

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## WHY TAKE AN INFORMA CONNECT COURSE?



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wherever you have an  
internet connection



**Flexible** –  
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**Professional** –  
industry leading course  
directors and tutors



**Network** – with tutors and  
like-minded professionals  
from around the world.  
Use our online tutorial  
forum to ask questions  
and share knowledge



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