

PROFESSIONAL CERTIFICATE IN TRANSFER PRICING AND INTERNATIONAL TAX

International tax and transfer pricing is a complex speciality that represents a unique blend of tax law, accounting, business practice and economics and remains a top priority for revenue authorities globally, with a growing emphasis on audits and disputes. The purpose of this professional certificate is to equip learners with the adequate skills to understand the intricacies of the international tax laws, transfer pricing rules and methods, compliance issues and dispute resolution within a South African context.

COURSE DELIVERY

The course is delivered via The Tax Faculty's virtual campus via an interactive online platform.

COURSE PROGRAMME

The course is delivered across two semesters:

Semester 1: Focus on international tax

- Basic principles of international tax law.
- Double taxation conventions (DTCs), focusing on the Organisation for Economic Co-operation and Development (OECD) model tax convention.
- Transfer pricing and thin capitalisation rules.
- International tax avoidance.
- Miscellaneous topics.

Semester 2: Transfer pricing specialism

- Fundamental sources.
- The arm's length principle.
- Functional analysis.
- Transfer pricing methods.
- Comparability.
- Specific transactions.
- Permanent establishments.
- Compliance issues and required documentation.
- Application within the ITR14.
- Avoiding double taxation.
- Dispute resolution.



DURATION OF THE COURSE

12 months.

LANGUAGE

The teaching medium is English.

REGISTRATION REQUIREMENTS

Open to individuals currently working within transfer pricing or for experienced tax practitioners/accountants wanting to specialise in transfer pricing.

An NQF7 qualification in taxation, law or accounting is recommended.

FEES

Payment option 1: Once-off payment

R22 950.00 (incl. VAT).

Payment option 2: Debit order

Application fee (non-refundable): R450 (incl. VAT).

12 instalments: R2 199.00 per month (incl. VAT).

Total: R26 392.50 (incl. VAT).

Payment option 3: SAIT members in good standing discount

Once-off payment: Qualify for a 25% discount.

Monthly options: application fee (non-refundable) of R450.00 and a 25% discount on the total amount. * *The discount will decrease the number of debit orders and not the monthly amount, thus 12 months would become 9 months of debit orders.*

FOR MORE INFORMATION ON THIS COURSE [CLICK HERE](#)

