

Transfer Pricing for Crude Marketing & Financing Training Course

OGI-1163 · 5 days · 15 CPD hours · English

Overview

The Transfer Pricing for Crude Marketing & Financing Training Course from [Institute For Oil & Gas Training](#) develops practical capability for managing Transfer Pricing issues across crude marketing, financing and related-party transactions in the oil and gas sector. The course addresses the commercial and tax risks that arise when crude sales to related parties, intra-group financing, marketing functions, shared services and personnel costs are priced and documented across jurisdictions.

Oil and gas groups operate through complex structures involving exploration and production entities, trading companies, marketing affiliates, treasury functions, regional offices and corporate headquarters. These structures create substantial volumes of intercompany transactions that require commercially supportable pricing and appropriate tax treatment. Transfer Pricing therefore sits at the intersection of crude marketing, international taxation, financial management, corporate structuring and compliance.

The course focuses on the practical application of transfer pricing principles to transactions that are common across upstream, midstream and downstream businesses. Participants examine crude sales to related parties, reference pricing and posted prices, marketing margin analysis, intercompany financing and intra-group loan pricing. The programme also addresses thin capitalisation rules, interest deductibility limitation, head office cost allocation, secondment and personnel charges, providing a connected view of how different related-party arrangements affect taxable income and commercial performance.

Crude marketing presents distinctive transfer pricing challenges because pricing depends on crude quality, destination, market conditions, transportation arrangements, pricing formulas, benchmark references and contractual terms. Related-party crude transactions require careful analysis of the functions performed, assets employed and risks assumed by each entity. Participants develop the ability to assess whether pricing arrangements reflect the commercial substance of the transaction and whether the supporting documentation provides a defensible basis for the treatment adopted.

Reference pricing and posted prices are particularly important when assessing crude sales. The course explores how observable market references support the analysis of related-party crude transactions and how differences in quality, location, freight, timing, volume and contractual conditions affect comparability. Participants learn how to distinguish a genuine commercial adjustment from a pricing feature that requires closer transfer pricing analysis.

Marketing margin analysis is another central component. Oil and gas groups frequently separate production, trading and marketing functions across different entities. Understanding the economic contribution of each entity is essential when determining how value and remuneration should be allocated. The course examines the relationship between trading functions, market access, customer relationships, logistics, inventory exposure, credit risk and marketing remuneration.

Financing transactions create a separate set of transfer pricing considerations. Intra-group loan pricing requires assessment of the borrower, lender, loan terms, currency, maturity, security, credit profile and prevailing market conditions. The course connects these commercial considerations with tax rules governing financing costs, including thin capitalisation rules and interest deductibility limitation. Participants gain a structured approach to reviewing intercompany financing arrangements and identifying areas requiring further analysis or documentation.

The course also covers corporate costs that are allocated between operating companies and head office functions. Head office cost allocation requires a clear understanding of the services received, the beneficiaries of those services and the basis used to allocate costs. Secondment and personnel charges receive specific attention because employee arrangements frequently involve cross-border entities, shared personnel and changing responsibilities. Participants learn how to assess the commercial basis of these charges and establish appropriate supporting records.

Institute For Oil & Gas Training delivers the course with a strong emphasis on practical business application. The programme connects tax concepts with commercial realities so participants understand not only what transfer pricing rules require, but also how those requirements interact with crude marketing contracts, treasury arrangements, group services and operational decision-making.

The course is designed for organisations seeking stronger control over related-party transactions and more consistent coordination between tax, finance, trading, treasury, legal and commercial teams. It strengthens the ability to identify transfer pricing exposure before transactions are implemented, improve supporting documentation and establish clearer governance around intercompany pricing.

Participants also examine the relationship between transfer pricing analysis and tax authority scrutiny. A robust transfer pricing position depends on coherent transaction analysis, reliable supporting evidence, appropriate economic reasoning and consistency between contracts, accounting records and actual conduct. The course therefore develops an integrated approach to transfer pricing governance rather than treating documentation as a standalone compliance exercise.

By completing the programme, participants establish a stronger practical understanding of how transfer pricing applies to crude marketing and financing transactions. They gain tools for reviewing related-party pricing arrangements, analysing intercompany charges, challenging unsupported assumptions and communicating transfer pricing considerations effectively within their organisations.

Objectives

- Understand the role of Transfer Pricing within oil and gas corporate structures and international tax management
- Analyse crude sales to related parties using commercially relevant transaction characteristics
- Apply reference pricing and posted prices when assessing related-party crude transactions
- Evaluate crude quality, location, freight, timing and contractual differences affecting price comparability

- Assess marketing functions and develop structured approaches to marketing margin analysis
- Examine intra-group loan pricing using relevant commercial and financial characteristics
- Understand the interaction between transfer pricing and thin capitalisation rules
- Assess financing costs in relation to interest deductibility limitation requirements
- Review head office cost allocation using functional and beneficiary-based considerations
- Analyse secondment and personnel charges between related entities
- Identify transfer pricing risks within contracts, accounting records and intercompany arrangements
- Strengthen coordination between tax, finance, treasury, commercial and legal functions
- Improve the quality and consistency of transfer pricing documentation
- Identify transactions requiring deeper economic and tax analysis
- Develop practical approaches for reviewing related-party pricing arrangements
- Improve internal governance over intercompany transactions
- Communicate transfer pricing findings clearly to commercial and senior management teams

Training methodology

Institute For Oil & Gas Training uses an applied corporate training methodology built around realistic oil and gas transactions. The delivery connects transfer pricing principles with commercial, financial and tax decisions encountered by operating companies, trading entities, joint venture structures and corporate headquarters.

Case studies examine crude sales between related entities, allowing participants to assess pricing mechanisms, benchmark references, contractual differences and marketing functions. These exercises demonstrate how reference pricing and posted prices support transaction analysis and how commercial adjustments influence the assessment.

Practical scenarios address intra-group loan pricing through borrower and lender analysis. Participants review loan terms, currency, maturity, security and credit considerations before examining the relationship between financing charges and tax deductibility.

Group exercises focus on marketing margin allocation, head office cost allocation, secondment and personnel charges. Participants assess functions, benefits, risks and cost drivers before developing commercially supportable

approaches.

Simulation exercises place participants in situations involving tax, finance, treasury and commercial stakeholders. The exercises develop the ability to identify transfer pricing issues, challenge weak assumptions and communicate recommendations using clear commercial reasoning.

The programme also uses transaction-mapping exercises to connect contracts, operational conduct, accounting treatment and tax analysis. This approach helps participants identify inconsistencies between written agreements and actual activities.

Real-world scenarios are used to demonstrate how transfer pricing considerations develop across the oil and gas value chain. Participants work through issues involving production companies, marketing affiliates, financing entities and corporate service providers.

Organisational impact

The course strengthens organisational control over related-party transactions across crude marketing, financing and corporate service arrangements. Participants return with a structured understanding of the transaction characteristics that influence transfer pricing analysis, supporting stronger internal review processes.

Improved analysis of crude sales to related parties supports more consistent pricing governance. Organisations gain greater clarity when assessing benchmark references, posted prices, crude characteristics, freight adjustments, destination factors and contractual conditions.

Marketing margin analysis strengthens the organisation's ability to distinguish production functions from trading and marketing activities. This supports clearer allocation of remuneration between group entities and improves the commercial basis for intercompany pricing decisions.

The financing component strengthens oversight of intra-group loan pricing. Finance and tax teams gain a clearer framework for reviewing interest rates, loan terms, borrower characteristics and financing structures. This supports better alignment between treasury arrangements and tax requirements.

Greater awareness of thin capitalisation rules and interest deductibility limitation improves coordination between financing decisions and tax planning. Organisations can identify financing arrangements requiring review and establish stronger processes for evaluating related-party debt.

Head office cost allocation is addressed through a structured assessment of services, beneficiaries and allocation drivers. This improves transparency over corporate charges and strengthens the documentation supporting intercompany service arrangements.

The treatment of secondment and personnel charges receives focused attention, helping organisations establish clearer controls over cross-border employee costs. Better transaction records and clearer allocation methodologies support consistency between operational arrangements and accounting treatment.

The course also improves cross-functional communication. Transfer pricing issues often involve several departments, and a shared understanding across tax, finance, treasury, commercial, trading, legal and human resources teams reduces fragmented decision-making.

Stronger documentation practices provide organisations with a more coherent record of the commercial rationale behind related-party transactions. This supports internal governance, audit processes and responses to transfer pricing enquiries.

Personal impact

Participants develop practical Transfer Pricing skills that apply directly to crude marketing, financing and corporate service transactions.

They strengthen their ability to analyse crude sales to related parties and understand the commercial factors influencing transfer pricing outcomes. This includes examining pricing references, crude characteristics, freight, destination and contractual arrangements.

Participants gain stronger capability in marketing margin analysis and learn how functional responsibilities influence the remuneration of marketing entities.

They develop a structured approach to intra-group loan pricing and gain greater awareness of how financing terms interact with tax considerations such as thin capitalisation rules and interest deductibility limitation.

The course improves participants' ability to review head office cost allocation, secondment and personnel charges. They learn to identify the underlying services, beneficiaries, costs and allocation drivers relevant to these transactions.

Participants also improve their ability to identify inconsistencies between intercompany agreements, operational conduct and accounting records. This supports more effective internal reviews and clearer communication with tax and commercial stakeholders.

For tax professionals, the course strengthens sector-specific commercial understanding. For finance and treasury professionals, it builds greater awareness of tax implications surrounding related-party transactions. For commercial professionals, it provides stronger insight into the tax and governance considerations affecting intercompany pricing.

The programme also develops professional judgement in reviewing transfer pricing arrangements, identifying information gaps and determining when a transaction requires additional analysis.

Who should attend

Tax Managers and Tax Professionals

Designed for professionals responsible for transfer pricing, corporate taxation, international tax compliance and related-party transaction analysis.

Finance Managers and Financial Controllers

Relevant for finance leaders responsible for intercompany accounting, financial reporting, cost allocation and transaction governance.

Treasury Professionals

Useful for treasury teams managing intra-group loans, group financing structures, interest charges and funding arrangements.

Crude Marketing and Trading Professionals

Supports commercial professionals involved in crude sales, pricing mechanisms, trading structures, marketing arrangements and related-party transactions.

Commercial Managers

Provides insight into how contractual and operational decisions affect transfer pricing analysis and intercompany remuneration.

Accounting Professionals

Strengthens understanding of the transfer pricing implications of intercompany charges, financing costs, service fees and personnel costs.

Legal and Contract Professionals

Helps professionals responsible for intercompany agreements understand the relationship between contractual terms and actual commercial conduct.

Corporate Planning and Strategy Professionals

Provides a practical understanding of how group structures, financing arrangements and operating models influence related-party transaction analysis.

Internal Audit Professionals

Supports audit teams reviewing intercompany pricing, cost allocations, financing arrangements and transfer pricing governance.

Senior Managers and Department Heads

Relevant for leaders overseeing tax, finance, treasury, commercial, trading or corporate functions who require stronger oversight of related-party transactions.

Course outline

Transfer Pricing Foundations for Oil and Gas

This module establishes the practical foundations for Transfer Pricing within integrated oil and gas groups. It focuses on identifying related-party transactions, understanding the economic substance of transactions and connecting functional analysis with pricing decisions.

Crude Sales and Marketing Margin Analysis

This module focuses on crude sales to related parties and the pricing considerations affecting crude marketing arrangements. Participants examine reference pricing and posted prices, comparability factors and the economic functions performed by marketing entities.

Intra-Group Financing and Interest

This module examines transfer pricing considerations for group financing arrangements. Participants analyse intra-group loan pricing alongside thin capitalisation rules and interest deductibility limitation requirements.

Head Office Costs and Personnel Charges

This module addresses intercompany service arrangements involving corporate headquarters, shared functions, secondees and personnel. Participants examine how service benefits and allocation drivers influence the treatment of head office cost allocation and secondment and personnel charges.

Governance, Documentation and Risk Management

This module integrates crude marketing, financing and service transactions into a practical transfer pricing governance framework. Participants focus on documentation, transaction review, internal controls and cross-functional coordination.

Scheduled dates

Dates	Venue	Format	Fee
12 - 16 Oct 2026	Abu Dhabi, United Arab Emirates	In person	£4,100
12 - 16 Oct 2026	Abuja, Nigeria	In person	£4,100
12 - 16 Oct 2026	Accra, Ghana	In person	£4,100
12 - 16 Oct 2026	Addis Ababa, Ethiopia	In person	£4,100
12 - 16 Oct 2026	Al Ain, United Arab Emirates	In person	£4,100
12 - 16 Oct 2026	Al Khobar, Saudi Arabia	In person	£4,100
12 - 16 Oct 2026	Alberta, Canada	In person	£4,100
12 - 16 Oct 2026	AlUla, Saudi Arabia	In person	£4,100
12 - 16 Oct 2026	Amman, Jordan	In person	£4,100
12 - 16 Oct 2026	Amsterdam, Netherlands	In person	£4,100
12 - 16 Oct 2026	Athens, Greece	In person	£4,100
12 - 16 Oct 2026	Baku, Azerbaijan	In person	£4,100
12 - 16 Oct 2026	Barcelona, Spain	In person	£4,100

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12 - 16 Oct 2026	Berlin, Germany	In person	£4,100
12 - 16 Oct 2026	Boston, United States	In person	£4,100
12 - 16 Oct 2026	Brussels, Belgium	In person	£4,100
12 - 16 Oct 2026	Budapest, Hungary	In person	£4,100
12 - 16 Oct 2026	Cairo, Egypt	In person	£4,100
12 - 16 Oct 2026	Cape Town, South Africa	In person	£4,100
12 - 16 Oct 2026	Casablanca, Morocco	In person	£4,100
12 - 16 Oct 2026	Dammam, Saudi Arabia	In person	£4,100
12 - 16 Oct 2026	Dhahran, Saudi Arabia	In person	£4,100
12 - 16 Oct 2026	Doha, Qatar	In person	£4,100
12 - 16 Oct 2026	Dubai, United Arab Emirates	In person	£4,100
12 - 16 Oct 2026	Edinburgh, United Kingdom	In person	£4,100
12 - 16 Oct 2026	Edmonton, Canada	In person	£4,100
12 - 16 Oct 2026	Frankfurt, Germany	In person	£4,100
12 - 16 Oct 2026	Geneva, Switzerland	In person	£4,100
12 - 16 Oct 2026	Houston, United States	In person	£4,100
12 - 16 Oct 2026	Istanbul, Turkey	In person	£4,100
12 - 16 Oct 2026	Jakarta, Indonesia	In person	£4,100
12 - 16 Oct 2026	Jeddah, Saudi Arabia	In person	£4,100
12 - 16 Oct 2026	Jubail, Saudi Arabia	In person	£4,100
12 - 16 Oct 2026	Khamis Mushait, Saudi Arabia	In person	£4,100
12 - 16 Oct 2026	Kigali, Rwanda	In person	£4,100
12 - 16 Oct 2026	Kuala Lumpur, Malaysia	In person	£4,100
12 - 16 Oct 2026	Lisbon, Portugal	In person	£4,100
12 - 16 Oct 2026	Liverpool, United Kingdom	In person	£4,100
12 - 16 Oct 2026	London, United Kingdom	In person	£4,100

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12 - 16 Oct 2026	Los Angeles, United States	In person	£4,100
12 - 16 Oct 2026	Luanda, Angola	In person	£4,100
12 - 16 Oct 2026	Madrid, Spain	In person	£4,100
12 - 16 Oct 2026	Manama, Bahrain	In person	£4,100
12 - 16 Oct 2026	Marbella, Spain	In person	£4,100
12 - 16 Oct 2026	Marrakech, Morocco	In person	£4,100
12 - 16 Oct 2026	Miami, United States	In person	£4,100
12 - 16 Oct 2026	Milan, Italy	In person	£4,100
12 - 16 Oct 2026	Munich, Germany	In person	£4,100
12 - 16 Oct 2026	Muscat, Oman	In person	£4,100
12 - 16 Oct 2026	Nairobi, Kenya	In person	£4,100
12 - 16 Oct 2026	New York, United States	In person	£4,100
12 - 16 Oct 2026	Nice, France	In person	£4,100
12 - 16 Oct 2026	Nouakchott, Mauritania	In person	£4,100
12 - 16 Oct 2026	Oslo, Norway	In person	£4,100
12 - 16 Oct 2026	Paris, France	In person	£4,100
12 - 16 Oct 2026	Port Louis, Mauritius	In person	£4,100
12 - 16 Oct 2026	Prague, Czech Republic	In person	£4,100
12 - 16 Oct 2026	Pretoria, South Africa	In person	£4,100
12 - 16 Oct 2026	Riyadh, Saudi Arabia	In person	£4,100
12 - 16 Oct 2026	Rome, Italy	In person	£4,100
12 - 16 Oct 2026	Sarajevo, Bosnia and Herzegovina	In person	£4,100
12 - 16 Oct 2026	Sharm El Sheikh, Egypt	In person	£4,100
12 - 16 Oct 2026	Singapore	In person	£4,100
12 - 16 Oct 2026	Stockholm, Sweden	In person	£4,100
12 - 16 Oct 2026	Tokyo, Japan	In person	£4,100

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12 - 16 Oct 2026	Toronto, Canada	In person	£4,100
12 - 16 Oct 2026	Tromso, Norway	In person	£4,100
12 - 16 Oct 2026	Vienna, Austria	In person	£4,100
12 - 16 Oct 2026	Zagreb, Croatia	In person	£4,100
12 - 16 Oct 2026	Zurich, Switzerland	In person	£4,100
12 - 16 Oct 2026	Online, Virtual	Online	£4,100
08 - 12 Feb 2027	Abu Dhabi, United Arab Emirates	In person	£4,100
08 - 12 Feb 2027	Abuja, Nigeria	In person	£4,100
08 - 12 Feb 2027	Accra, Ghana	In person	£4,100
08 - 12 Feb 2027	Addis Ababa, Ethiopia	In person	£4,100
08 - 12 Feb 2027	Al Ain, United Arab Emirates	In person	£4,100
08 - 12 Feb 2027	Al Khobar, Saudi Arabia	In person	£4,100
08 - 12 Feb 2027	Alberta, Canada	In person	£4,100
08 - 12 Feb 2027	AlUla, Saudi Arabia	In person	£4,100
08 - 12 Feb 2027	Amman, Jordan	In person	£4,100
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08 - 12 Feb 2027	Cairo, Egypt	In person	£4,100
08 - 12 Feb 2027	Cape Town, South Africa	In person	£4,100
08 - 12 Feb 2027	Casablanca, Morocco	In person	£4,100

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08 - 12 Feb 2027	Dammam, Saudi Arabia	In person	£4,100
08 - 12 Feb 2027	Dhahran, Saudi Arabia	In person	£4,100
08 - 12 Feb 2027	Doha, Qatar	In person	£4,100
08 - 12 Feb 2027	Dubai, United Arab Emirates	In person	£4,100
08 - 12 Feb 2027	Edinburgh, United Kingdom	In person	£4,100
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08 - 12 Feb 2027	Toronto, Canada	In person	£4,100
08 - 12 Feb 2027	Tromso, Norway	In person	£4,100
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07 - 11 Jun 2027	Abu Dhabi, United Arab Emirates	In person	£4,100

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11 - 15 Oct 2027	Al Khobar, Saudi Arabia	In person	£4,100
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11 - 15 Oct 2027	Dhahran, Saudi Arabia	In person	£4,100
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11 - 15 Oct 2027	Dubai, United Arab Emirates	In person	£4,100
11 - 15 Oct 2027	Edinburgh, United Kingdom	In person	£4,100
11 - 15 Oct 2027	Edmonton, Canada	In person	£4,100
11 - 15 Oct 2027	Frankfurt, Germany	In person	£4,100
11 - 15 Oct 2027	Geneva, Switzerland	In person	£4,100
11 - 15 Oct 2027	Houston, United States	In person	£4,100
11 - 15 Oct 2027	Istanbul, Turkey	In person	£4,100
11 - 15 Oct 2027	Jakarta, Indonesia	In person	£4,100
11 - 15 Oct 2027	Jeddah, Saudi Arabia	In person	£4,100
11 - 15 Oct 2027	Jubail, Saudi Arabia	In person	£4,100
11 - 15 Oct 2027	Khamis Mushait, Saudi Arabia	In person	£4,100

Dates	Venue	Format	Fee
11 - 15 Oct 2027	Kigali, Rwanda	In person	£4,100
11 - 15 Oct 2027	Kuala Lumpur, Malaysia	In person	£4,100
11 - 15 Oct 2027	Lisbon, Portugal	In person	£4,100
11 - 15 Oct 2027	Liverpool, United Kingdom	In person	£4,100
11 - 15 Oct 2027	London, United Kingdom	In person	£4,100
11 - 15 Oct 2027	Los Angeles, United States	In person	£4,100
11 - 15 Oct 2027	Luanda, Angola	In person	£4,100
11 - 15 Oct 2027	Madrid, Spain	In person	£4,100
11 - 15 Oct 2027	Manama, Bahrain	In person	£4,100
11 - 15 Oct 2027	Marbella, Spain	In person	£4,100
11 - 15 Oct 2027	Marrakech, Morocco	In person	£4,100
11 - 15 Oct 2027	Miami, United States	In person	£4,100
11 - 15 Oct 2027	Milan, Italy	In person	£4,100
11 - 15 Oct 2027	Munich, Germany	In person	£4,100
11 - 15 Oct 2027	Muscat, Oman	In person	£4,100
11 - 15 Oct 2027	Nairobi, Kenya	In person	£4,100
11 - 15 Oct 2027	New York, United States	In person	£4,100
11 - 15 Oct 2027	Nice, France	In person	£4,100
11 - 15 Oct 2027	Nouakchott, Mauritania	In person	£4,100
11 - 15 Oct 2027	Oslo, Norway	In person	£4,100
11 - 15 Oct 2027	Paris, France	In person	£4,100
11 - 15 Oct 2027	Port Louis, Mauritius	In person	£4,100
11 - 15 Oct 2027	Prague, Czech Republic	In person	£4,100
11 - 15 Oct 2027	Pretoria, South Africa	In person	£4,100
11 - 15 Oct 2027	Riyadh, Saudi Arabia	In person	£4,100
11 - 15 Oct 2027	Rome, Italy	In person	£4,100

Dates	Venue	Format	Fee
11 - 15 Oct 2027	Sarajevo, Bosnia and Herzegovina	In person	£4,100
11 - 15 Oct 2027	Sharm El Sheikh, Egypt	In person	£4,100
11 - 15 Oct 2027	Singapore	In person	£4,100
11 - 15 Oct 2027	Stockholm, Sweden	In person	£4,100
11 - 15 Oct 2027	Tokyo, Japan	In person	£4,100
11 - 15 Oct 2027	Toronto, Canada	In person	£4,100
11 - 15 Oct 2027	Tromso, Norway	In person	£4,100
11 - 15 Oct 2027	Vienna, Austria	In person	£4,100
11 - 15 Oct 2027	Zagreb, Croatia	In person	£4,100
11 - 15 Oct 2027	Zurich, Switzerland	In person	£4,100
11 - 15 Oct 2027	Online, Virtual	Online	£4,100

Certificate

Attendees receive a Certificate of Completion from Institute For Oil & Gas Training upon successfully finishing the course. The certificate is issued to participants who meet the required attendance requirement for the full programme.