

A vertical photograph of a modern building's facade, featuring a complex, geometric pattern of blue and white panels that create a sense of depth and movement. The building is set against a clear blue sky.

2026 Training Program for Transfer Pricing, Tax, Legal and IP Professionals

Online Workshops on
Intercompany Agreements
and the Legal Aspects of
Intercompany Transactions
for Multinational Groups

2026 Training Program for Transfer Pricing, Tax, Legal and Intellectual Property Professionals

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Why multinational groups and advisory firms need training on the legal aspects of intra-group transactions

Gaps and defects in the legal design, implementation and analysis of intercompany transactions expose groups to significant risks. These include tax liabilities for errors and omissions in transfer pricing analysis and tax filings, penalties for failure to produce compliant transfer pricing documentation, denial of corporation tax deductions, the cashflow impact of withholding taxes, the operational impact of customs and tariffs non-compliance, and regulatory sanctions.

Key:

For Transfer Pricing and International Tax professionals	
For Legal, IP and Compliance professionals	
For multinational groups operating in specified sectors	
Advanced sessions on specific transaction types and issues	

Who the workshops are for

The workshops listed below are designed for transfer pricing, tax, legal and IP professionals in corporates, advisory firms and tax administrations. Participants will gain an understanding of the legal aspects of intercompany transaction design, and will be equipped with practical approaches for reviewing and maintaining intercompany agreements.

Format of the workshops

Each workshop is hosted via Microsoft Teams (or the platform of your choice) and facilitated by a senior member of the LCN team. The typical running time of each workshop is 50 minutes plus Q&A. There is no limit to the number of attendees. Sessions are designed to be interactive and include self-assessment questions.

1. Legal Aspects of Transfer Pricing: The Fundamentals

An introduction to the legal aspects of transfer pricing and intercompany transaction design. Includes a briefing on how the legal fact pattern and contractual terms impact outcomes under the OECD Transfer Pricing Guidelines, and the role which intercompany agreements play in the transfer pricing and tax compliance lifecycle.

2. A Transfer Pricing Professional's Guide to Reviewing Intercompany Agreements

Practical guidance on how to review and comment on draft intercompany agreements without giving legal advice. Includes a practical framework for assessing whether draft or sample agreements align with the relevant transfer pricing policies.

3. A Transfer Pricing Professional's Guide to Legal Rights in Intangibles for DEMPE Analysis

A briefing on the legal aspects of transactions involving intangibles, including how to reconcile legal rights with DEMPE analysis. Includes a discussion of the typical categories of IP rights, their differing characteristics from a commercial and legal perspective, and how they impact DEMPE analysis and transaction design.

Tailored for your organisation

Select whichever of the listed modules are most relevant for your organisation.

To enquire about pricing and availability

To request details of pricing and availability, email us at info@lcnlegal.com. Discounts apply where multiple sessions are booked. Sessions are free for LCN strategic partners, subject to availability. Early booking is advised to reserve dates.

About LCN

LCN are specialists in managing the legal implementation of transfer pricing policies and group reorganizations.

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4. Introduction to Transfer Pricing for Legal and IP Professionals

An introduction to the core principles of transfer pricing for legal and intellectual property professionals. Includes a practical briefing on the role of lawyers and IP professionals in supporting groups' tax and transfer pricing positions and avoiding unnecessary tax charges, fines and penalties.

5. How to Read Transfer Pricing Documentation: An Introduction for Legal Professionals

Practical guidance for legal professionals on how to read and interpret transfer pricing documentation (including Master Files and Local Files), with a view to (a) providing legal input which may change the economic analysis of transactions, and (b) creating and maintaining an effective and compliant portfolio of intercompany agreements.

6. Pricing Clauses and other Drafting Considerations

A briefing on pricing clauses and practical guidance on the most common drafting issues which arise in relation to intercompany agreements. Includes consideration of specific provisions needed to achieve alignment with transfer pricing policies and the needs of wider stakeholders.

7. Intercompany Transactions for Software and SaaS Groups

A practical briefing on typical intercompany transaction types for software and SaaS groups, how to analyse them from a legal and commercial perspective, and how to design and implement them legally.

8. Intercompany Transactions for Services and Consulting Groups

A briefing on typical transaction types for groups which provide services, including consulting groups, marketing services, technical services, engineering services and software development services.

9. Intercompany Transactions for Manufacturing Groups

An introduction to the key legal issues affecting typical transaction types for groups which sell physical products. Includes intercompany transactions such as manufacturing, procurement and distribution arrangements, as well as approaches for the legal implementation of target margin arrangements (such as those applying to Amount B distributors).

10. Intercompany Support Services

An introduction to the legal aspects of the design of intercompany transactions involving services. Includes a focus on management services and back office services as well as lead contractor / subcontractor arrangements.

LCN designs, implements and maintains intercompany agreements to support compliance, reduce risk and maximize shareholder value.

Since our establishment in 2013, LCN has been trusted by multinational groups with combined annual revenues of over US\$ 160 billion to help create and maintain intercompany agreements for transfer pricing and regulatory compliance.

Three things make us unique:

1. World-leading experts in intercompany agreements: We are recognized and award-winning thought leaders in the legal design and implementation of intercompany transactions.

2. Global and cross-functional perspective: We leverage our experience of working alongside hundreds of multinational groups and advisors globally to save you time and avoid costly mistakes.

3. Ongoing support to maintain audit-readiness: LCN provides ongoing support to make sure agreements and legal structures remain current, tax-audit ready and transaction ready.

LCN does not advise on tax or transfer pricing. We work collaboratively with transfer pricing and tax professionals to design, implement and maintain tax audit-ready intercompany agreements.

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11. Intercompany Financial Transactions

An introduction to the legal aspects of designing financial transactions between related parties, including the role of the legal fact pattern (such as security and covenants) in transfer pricing analysis, as well as common structures such as loan notes and cash pooling arrangements.

12. Intercompany Profit Split Arrangements

An introduction to the key legal issues affecting the scoping, design and implementation of transactional profit split arrangements. Includes legal considerations regarding unique and valuable contributions, profit splitting factors and the treatment of losses.

13. Intercompany Cost Sharing / Cost Contribution Arrangements

An introduction to the key legal issues relating to CSAs / CCAs. Includes a discussion of platform contribution transactions and compliance with US Treasury Regulations as regards the form, content and timing of agreements.

14. M&A Integration and DD Readiness

A briefing on the legal aspects of M&A integration, including the most commonly considered options for integrating acquired IP, legal considerations affecting structure design and key legal feasibility issues on intra-group transfers of assets and functions. Includes a discussion of the impact of intercompany transaction design on DD readiness and transaction readiness (e.g. exit, IPO).

Note: We have deliberately designed areas of overlap between the respective modules. This is to reinforce participants' understanding of key concepts, and to provide context. The team at LCN can advise organisations on the appropriate selection of modules for different audiences, in order to optimise learning outcomes.

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