# Comprehensive Transfer Pricing Training

1 – 12 November 2027
Cape Town ( South Africa)



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## Introduction

Welcome to the Advanced Transfer Pricing Course, a specialized and comprehensive program designed to provide participants with in-depth knowledge and practical skills related to transfer pricing issues, focusing specifically on intangibles and other key areas. This advanced-level course is tailored for professionals with a strong foundation in transfer pricing concepts who wish to explore the complexities surrounding intangible assets, intellectual property, and other essential aspects of global transfer pricing. By combining theoretical discussions, case studies, and interactive exercises, participants will enhance their expertise in managing transfer pricing challenges related to intangibles within multinational enterprises.

## Course Objectives

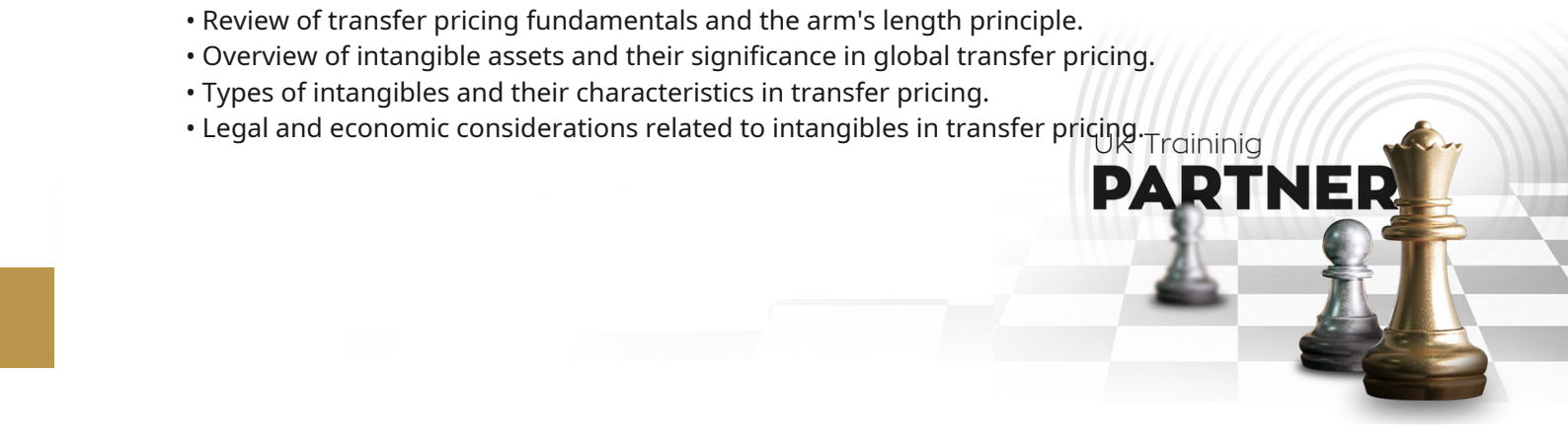
This transfer pricing training will equip you with the necessary knowledge to:

- Develop a deep understanding of transfer pricing principles and methodologies related to intangibles.
- Gain insights into the identification, valuation, and management of intangibles for transfer pricing purposes.
- Acquire knowledge of the legal and economic aspects of intangibles in transfer pricing.
- Understand the challenges and best practices for documenting and defending transfer pricing agreements involving intangibles.
- Learn how to analyze and address transfer pricing disputes and controversies specific to intangibles.
- Explore the latest transfer pricing regulations and trends in international transfer pricing, especially concerning intangibles.
- Apply practical tools and techniques to optimize transfer pricing outcomes for transactions involving intangibles within multinational enterprises.

## Course Outlines

### Day 1: Transfer Pricing Fundamentals

- Review of transfer pricing fundamentals and the arm's length principle.
- Overview of intangible assets and their significance in global transfer pricing.
- Types of intangibles and their characteristics in transfer pricing.
- Legal and economic considerations related to intangibles in transfer pricing.



## Day 2: Valuation of Intangibles for Transfer Pricing Purposes

- Methods and approaches for valuing intangibles.
- Comparable uncontrolled price CUP method for intangibles.
- Income-based valuation methods: profit split method and royalty relief method.
- Cost-based methods for intangibles.

## Day 3: Intangibles in Transfer Pricing Documentation and Compliance

- Transfer pricing compliance requirements for intangibles.
- Best practices for documenting intangibles and their contributions to transfer pricing.
- Intangible-related transactional analyses and benchmarking.
- Addressing risk and control functions related to intangibles.

## Day 4: Transfer Pricing Disputes and Controversies Involving Intangibles

- Common transfer pricing problems and disputes related to intangibles.
- Analyzing and addressing transfer pricing controversies specific to intangibles.
- Advanced dispute resolution mechanisms for intangible-related transfer pricing issues.
- Case studies and legal developments related to intangibles.

## Day 5: Emerging Trends and Practical Applications

- BEPS Base Erosion and Profit Shifting and its impact on intangibles in transfer pricing.
- Challenges in the digital economy, cloud computing, and intangible-related issues.
- Practical case studies and group exercises focused on intangibles.
- Strategies for optimizing transfer pricing outcomes involving intangibles.

## Day 6: Benchmarking for Intangibles in Transfer Pricing

- Importance of benchmarking in transfer pricing involving intangibles.
- Methods for benchmarking intangible transactions.
- Comparable companies analysis for intangibles.
- Selecting and applying appropriate comparables for intangibles.

## Day 7: Economic Analysis in Transfer Pricing for Intangibles

- Understanding economic analysis principles in the context of intangibles.
- Application of economic theory to transfer pricing strategies.
- Case studies illustrating economic analysis in practice.
- Tools and methodologies for economic analysis in transfer pricing.



### Day 8: Sector-Specific Considerations in Intangibles

- Analysis of sector-specific issues related to intangibles e.g., pharmaceuticals, technology, entertainment.
- Understanding unique challenges and opportunities within different industries.
- Tailored strategies for handling intangibles in various sectors.
- Group discussions on sector-specific case studies.

### Day 9: Advanced Transfer Pricing Techniques and Tools

- Exploration of innovative tools and software for transfer pricing management.
- Techniques for ensuring compliance and reducing risks in transfer pricing.
- Integrating data analytics into transfer pricing processes.
- Hands-on exercises using transfer pricing software.

### Day 10: Group Project and Course Wrap-Up

- Participants work in groups to develop a comprehensive transfer pricing strategy for a hypothetical multinational enterprise, focusing on intangibles.
- Presentation of group projects for feedback.
- Review of key learnings and insights gained throughout the course.
- Discussion on future trends and continuous learning in transfer pricing.

## Why Attend This Course: Wins & Losses!

- Advanced transfer pricing training will enhance your understanding of how to manage transfer pricing agreements and document transactions involving intangibles.
- Explore transfer pricing strategies that optimize pricing for intangibles in different industries, including technology and pharmaceuticals.
- Gain expertise in transfer pricing compliance and learn to handle complex transfer pricing disputes and controversies.
- Stay up-to-date with the latest trends and international transfer pricing regulations, such as BEPS and the challenges of the digital economy.
- Improve your understanding of the transfer pricing process, ensuring you can better manage risks and identify transfer pricing opportunities within your organization.

## Conclusion

By participating in this advanced transfer pricing course, you will gain a deep understanding of the complex issues surrounding intangibles in global transfer pricing. Whether you are involved in pricing strategy, pricing management, or pricing analysis, this course will equip you with the necessary skills to enhance compliance, improve risk management, and optimize transfer pricing outcomes.

**Join us now and explore the cutting-edge principles and tools necessary for navigating the world of global transfer pricing, with a particular focus on intangibles.**

