BLACKBIRD FOR TRAINING

# Developing Countries & Dispute Resolution in Intangibles TP

13 – 17 December 2026
Cairo (Egypt)



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## Introduction

In the context of international business, the valuation and transfer pricing TP of intangible assets pose significant challenges, especially for developing countries. As these economies become more integrated into the global marketplace, understanding how to manage and resolve disputes related to intangible assets is essential for maintaining competitiveness and compliance with international regulations. This course will explore the unique challenges faced by developing countries in the realm of intangible asset transfer pricing, focusing on the dispute resolution process and strategies to minimize conflicts.

By attending this course, participants will gain insights into the nuances of intangible asset TP, the specific challenges that developing countries face in this area, and practical methods for resolving disputes efficiently. Participants will also learn how to navigate complex tax regulations and global standards that impact their decision-making in the digital and intangible asset space.

## Course Objectives

- Understand Transfer Pricing for Intangibles in Developing Countries: Learn the key principles of transfer pricing and how it applies to intangible assets in developing economies.
- Identify Dispute Resolution Mechanisms: Gain practical knowledge of how to effectively manage and resolve disputes related to intangible asset transfer pricing.
- Learn Best Practices for TP Compliance: Understand the strategies for ensuring compliance with local and international tax regulations regarding intangible assets.
- Explore the Unique Challenges of Developing Economies: Discuss the specific obstacles that developing countries face in the realm of intangible assets and transfer pricing.
- Apply Dispute Resolution Techniques: Learn effective techniques to manage conflicts and resolve transfer pricing disputes related to intangibles.

## Course Outlines

### Day 1: Introduction to Transfer Pricing TP for Intangibles in Developing Countries



- Overview of Transfer Pricing and Intangibles
    - Definition of transfer pricing and its significance for intangible assets.
    - Key types of intangible assets and their role in the global economy.
    - Challenges specific to developing countries when managing transfer pricing for intangibles.
- Global Framework and Guidelines
    - Overview of international transfer pricing guidelines, including OECD and UN guidelines.
    - How transfer pricing regulations impact developing countries.
    - Key factors to consider when assessing TP for intangible assets.

## Day 2: Transfer Pricing Challenges in Developing Countries

- Key Issues Faced by Developing Countries in TP for Intangibles
    - Lack of infrastructure and expertise in handling intangible asset valuation and TP.
    - Data limitations and difficulties in comparing intangible assets.
    - Regulatory and tax complexity in developing countries.
- Valuation and Documentation of Intangible Assets
    - Methods for valuing intangible assets in developing countries.
    - The importance of proper documentation in TP practices.
    - Practical challenges in documenting intangible asset transactions and valuations.

## Day 3: Dispute Resolution Mechanisms in TP for Intangibles



- Introduction to Dispute Resolution in Transfer Pricing
    - The types of disputes that arise in TP for intangibles.
    - Dispute resolution processes and mechanisms under OECD and UN frameworks.
    - The role of tax authorities, taxpayers, and intermediaries in resolving disputes.
- Mediation, Arbitration, and Litigation
    - Overview of alternative dispute resolution methods such as mediation and arbitration.
    - When to resort to litigation in cases of unresolved TP disputes.
    - The pros and cons of each approach and their relevance to developing countries.

## Day 4: Managing TP Disputes in Developing Countries

- Building Effective Dispute Resolution Strategies
    - Steps to take before, during, and after a dispute arises.
    - How to engage with local tax authorities and international bodies.
    - Using Advance Pricing Agreements APAs and Mutual Agreement Procedures MAPs to prevent disputes.
- Case Studies of Disputes in Developing Countries
    - Real-life examples of TP disputes related to intangibles in developing economies.
    - Lessons learned from past cases and how they could have been avoided or resolved.

## Day 5: Best Practices for Compliance and Avoiding Disputes



- Ensuring Compliance with Transfer Pricing Regulations
    - How to align with local and international transfer pricing rules.
    - Monitoring and adjusting transfer pricing policies to avoid disputes.
    - The importance of proactive risk management in TP for intangibles.
- Preventive Strategies for Dispute Avoidance
    - The role of internal controls and audits in minimizing risks.
    - Communication strategies with tax authorities to avoid misunderstandings.
    - Developing a long-term strategy for handling TP disputes in the context of intangible assets.
- Course Recap and Final Q&A
    - Review of key concepts, strategies, and tools covered throughout the course.
    - Open Q&A session to address any remaining questions or specific issues related to TP and intangible assets in developing countries.

## Why Attend This Course: Wins & Losses!

By attending this course, participants will be equipped with:

- Wins in Transfer Pricing for Intangibles: Gain an in-depth understanding of the complexities of transfer pricing for intangible assets, with a focus on the specific challenges faced by developing countries.
- Wins in Dispute Resolution: Learn effective dispute resolution strategies and mechanisms to handle and prevent TP-related disputes.
- Avoiding Losses in Compliance: Learn how to ensure full compliance with international and local tax regulations to avoid costly penalties and conflicts.
- Strategic Advantages for Developing Economies: Understand how to navigate the unique obstacles faced by developing countries in the intangible asset TP space and turn these challenges into opportunities.



## Conclusion

At the end of this course, participants will be equipped with the skills and knowledge to navigate the complexities of transfer pricing for intangible assets in developing countries. They will learn how to manage and resolve disputes, ensuring compliance with both local and international regulations. Additionally, participants will be prepared to apply effective strategies to prevent future disputes and enhance their organizations' handling of intangible asset transfer pricing.

**We look forward to helping you build a comprehensive understanding of the challenges and opportunities that developing countries face in the realm of intangible assets and transfer pricing.**

