

Comprehensive Transfer Pricing Training

Amsterdam (Netherlands)

9 - 13 June 2025

UK Training

PARTNER



Comprehensive Transfer Pricing Training

Code: FA28 From: 9 - 13 June 2025 City: Amsterdam (Netherlands) Fees: 4200 Pound

Introduction

The Advanced Transfer Pricing Course is a comprehensive program designed to provide participants with in-depth knowledge and practical skills related to transfer pricing issues specifically focused on intangibles and other related topics. This advanced-level course is tailored for professionals who already possess a solid understanding of transfer pricing fundamentals and wish to explore the complexities surrounding intangible assets, intellectual property, and other key aspects of transfer pricing. Through a combination of theoretical discussions, case studies, and interactive exercises, participants will enhance their expertise in managing transfer pricing challenges related to intangibles within multinational enterprises.

Objectives

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

Course Outline

Day 1

Transfer Pricing

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

Day 2

A graphic of a chessboard with several chess pieces (a king, a queen, a rook, and a pawn) on it. The pieces are gold and silver. The board is white and black squares. The text 'UK Training PARTNER' is overlaid on the right side of the board.

UK Training
PARTNER

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 documentation requirements for intangibles.
- Best practices for documenting intangibles and their contributions.
- 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 issues and disputes related to intangibles.
- Analyzing and addressing transfer pricing controversies specific to intangibles.
- Advanced dispute resolution mechanisms for intangible-related transfer pricing issues.
- Recent 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.
- Digital economy, cloud computing, and intangible-related challenges.
- Practical case studies and group exercises focused on intangibles.
- Strategies for optimizing transfer pricing outcomes involving intangibles.

Benchmarking for Intangibles in Transfer Pricing

- Importance of benchmarking in transfer pricing involving intangibles.
- Methods and approaches for benchmarking intangible transactions.
- Comparable companies analysis for intangibles.
- Selection and application of appropriate comparables for intangibles.
- Practical considerations and challenges in benchmarking intangibles.

Blackbird Training Cities

Europe

izmir



Podgorica (Montenegro)



Stockholm (Sweden)



Lyon (France)



Copenhagen (Denmark)



Bordeaux (France)



Annecy (France)



Oslo (Norway)



Edinburgh (UK)



Glasgow (Scotland)



Malaga (Spain)



London (UK)



Istanbul (Turkey)



Amsterdam (Netherlands)



Düsseldorf (Germany)



Paris (France)



Barcelona (Spain)



Munich (Germany)



Geneva (Switzerland)



Prague (Czech)



Vienna (Austria)



Rome (Italy)



Brussels (Belgium)



Madrid (Spain)



Berlin (Germany)



Lisbon (Portugal)



Manchester (UK)



Milan (Italy)

USA & Canada



Los Angeles (USA)



Florida (USA)



Online



Boston (USA)



Washington (USA)



Miami (USA)



New York (USA)



Toronto (Canada)



Blackbird Training Cities

Asia



Baku (Azerbaijan)



Maldives (Maldives)



Manila (Philippines)



Bali (Indonesia)



Bangkok (Thailand)



Beijing (China)



Moscow (Russia)
(Malaysia)



Singapore (Singapore)



Sydney (Australia)



Tokyo (Japan)



Dubai (UAE)



Kuala Lumpur



Jakarta (Indonesia)

Africa



Kigali (Rwanda)



Cape Town (South Africa)



Accra (Ghana)



Lagos (Nigeria)



Marrakesh (Marocco)



Nairobi (Kenya)



Cairo (Egypt)



Sharm El-Sheikh (Egypt)



Casablanca (Morocco)



Tunis (Tunisia)



Blackbird Training Clients



UK Training
PARTNER

Blackbird Training Categories

Management & Admin

Professional Skills
Finance, Accounting, Budgeting
Media & Public Relations
Project Management
Human Resources
Audit & Quality Assurance
Marketing, Sales, Customer Service
Secretary & Admin
Supply Chain & Logistics
Management & Leadership
Agile and Refinement

Technical Courses

Hospital Management
Public Sector
Special Workshops
Oil & Gas Engineering
Telecom Engineering
IT & IT Engineering
Health & Safety
Law and Contract Management
Customs & Safety
Aviation
C-Suite Training



International House 185 Tower Bridge
Road London SE1 2UF United Kingdom



+44 7401 1773 35
+44 7480 775526



training@blackbird-training.com



www.blackbird-training.com

UK Training

PARTNER

