

## Comprehensive Transfer Pricing Training

*Berlin (Germany)*

*12 - 16 May 2025*

UK Training

# PARTNER



## Comprehensive Transfer Pricing Training

Code: FA28 From: 12 - 16 May 2025 City: Berlin (Germany) Fees: 7100 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 concepts 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.

### Course 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 agreements involving intangibles.
- Learn how to analyze and address transfer pricing disputes and controversies specific to intangibles.
- 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.

### Course Outlines

#### Day 1: Transfer Pricing Fundamentals

- Review of transfer pricing fundamentals and the arm's length principle.
- Overview of intangible assets and their importance in global transfer pricing.
- Types of intangibles and their characteristics.
- 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

The logo for UK Training Partner features the text 'UK Training' in a smaller font above the word 'PARTNER' in a large, bold, black font. The background of the logo is a chessboard with several chess pieces (a king, a pawn, and a knight) in gold and silver, set against a background of concentric circles.

- Transfer pricing compliance 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 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.
- 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.
- 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 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.

#### 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.

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

- Analysis of sector-specific issues related to intangibles e.g., pharmaceuticals, technology, entertainment.
- Understanding the unique challenges and opportunities within different industries.
- Tailored strategies for handling intangibles in various sectors.
- Group discussions on real-world 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.
- Integration of data analytics in transfer pricing processes.
- Hands-on exercises using transfer pricing software.

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

A graphic of a chessboard with several chess pieces (a king, a pawn, and a knight) on it, set against a background of concentric circles. The text 'UK Training PARTNER' is overlaid on the right side of the board.

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

### Conclusion

This transfer pricing training course presents an excellent opportunity for professionals seeking to deepen their knowledge and skills in transfer pricing, with a focus on the importance of intangibles in the global business environment. Through hands-on training and in-depth topics, participants will develop effective strategies and ensure compliance with transfer pricing requirements, thereby enhancing their ability to manage risks and leverage transfer pricing opportunities.

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