

Comprehensive Transfer Pricing Training

Geneva (Switzerland)

28 April - 2 May 2025

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Code: FA28 From: 28 April - 2 May 2025 City: Geneva (Switzerland) Fees: 7900 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

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- 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 queen, a rook, and a pawn) on it, set against a background of concentric circles. The text 'UK Training PARTNER' is overlaid on 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.

A graphic of a chessboard with several chess pieces (a king, a queen, and a pawn) on it, set against a background of concentric circles.

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