

Comprehensive Transfer Pricing Training

Brussels (Belgium)

19 - 23 August 2024

UK Training

PARTNER



Comprehensive Transfer Pricing Training

Code: FA28 From: 19 - 23 August 2024 City: Brussels (Belgium) Fees: 4400 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 knight) positioned on it. The board is white and black, and the pieces are gold and silver. 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



Podgorica (Montenegro)



Stockholm (Sweden)



Lyon (France)



Birmingham (UK)



Copenhagen (Denmark)



Bordeaux (France)



Annecy (France)



Oslo (Norway)



Edinburgh (UK)



Glasgow (Scotland)



Sarajevo (Bosnia and Herzegovina)



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)



Zurich (Switzerland)



Manchester (UK)



Milan (Italy)

USA & Canada



Los Angeles (USA)



Florida (USA)



Online



Boston (USA)



Washington (USA)



Miami (USA)



New York (USA)



Malta (Malta)



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

- Agile
- 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

 Sales@blackbird-training.com

 www.blackbird-training.com



UK Training
PARTNER

The image shows a chessboard with several chess pieces. A large gold king piece is in the foreground, with a silver pawn and a silver knight behind it. The board is set against a background of concentric circles.