

Comprehensive Transfer Pricing Training

Los Angeles (USA)

5 - 9 August 2024

UK Training

PARTNER



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Code: FA28 From: 5 - 9 August 2024 City: Los Angeles (USA) Fees: 5700 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 in shades of gold and silver. The board is white and black squares. In the background, there are concentric circles radiating from the center.

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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.

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