

COURSE PROGRAMME

Benchmarking and Valuation

Course Programme

Modules

Topics Covered

Roadmap for conducting a transfer pricing comparability analysis

- Importance of conducting a proper comparability analysis
- Nine-step process for performing a comparability analysis
- Impact of COVID-19 and potential solutions
- Case law decision – comparability analysis

Identifying comparables – tangible assets and intra-group services

- Defining a search strategy for typical intra-group goods and services transactions
- Process of manual review of comparables, reaching a final set of comparables, financial analysis and documentation
- Practical aspects of dealing with a lack of comparables and use of regional searches and other approaches

Identifying comparables – financing transactions and intangible assets

- Defining a search strategy for intra-group loans and financial guarantees transactions
- Defining a search strategy for intra-group transactions involving intangibles (licensing transactions)
- Case law decision discussing strengths and weaknesses of each party's comparability analysis

Comparability adjustments and determining the range

- Explaining the different types of comparability adjustments and when each of them is relevant, step-by-step approach to calculating working capital adjustments
- Impact of COVID-19 pandemic on comparability adjustments

Course Programme

Modules

Topics Covered

Pricing of loans and guarantees

- > Practical aspects of pricing loans and guarantees
- > Pricing exercises

Valuation of intangibles

- > The importance of intangibles for MNEs, the definition of intangibles and which intangibles can be valued
- > The use of valuation techniques for intangibles and the difference between the arm's length principle and the fair market value
- > Market-based and cost-based valuation approaches

Valuation of intangibles (continued)

- > Basic principles of income-based valuation methods and the relief-from-royalty method
- > Multi-period excess earnings method and the incremental cash flow method
- > OECD approach to hard-to-value intangibles

Content last reviewed

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Completion requirements

To benefit from the learning experience for this training, completing all mandatory components is necessary to obtain your certificate. Upon access to the learning platform, the syllabus will indicate the exact completion requirements. Please also consult the [FAQ](#) for more information.