HARD-TO-VALUE INTANGIBLES (HTVI), RISK ALLOCATION & DIGITAL BUSINESS MODELS



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Introduction

Hard-to-Value Intangibles (HTVI), Risk Allocation & Digital Business Models Training Course prepares tax, finance and valuation professionals to handle the most contested area of transfer pricing. Participants learn how the OECD HTVI framework works, when ex post outcomes may revise an ex ante price, and how risk allocation determines which entity earns the return. The programme covers DEMPE analysis, risk-free and risk-adjusted returns, digital platform models and permanent establishment questions in the digital economy. Furthermore, it examines valuation techniques and information asymmetry between taxpayers and authorities. As a result, delegates can price, document and defend positions on genuinely uncertain intangibles. Gentex Training Center delivers the programme through valuation workshops and dispute case work.

Hard-to-Value Intangibles (HTVI), Risk Allocation & Digital Business Models Course Objectives

- Explain the OECD HTVI framework and when ex post outcomes adjust an ex ante price.
- Apply DEMPE analysis to determine where intangible returns should arise.
- Identify and allocate risk among group entities under the OECD risk framework.
- Distinguish risk-free, risk-adjusted and entrepreneurial returns.
- Value hard-to-value intangibles using income, market and cost approaches.
- Assess information asymmetry and the evidence authorities expect.
- Analyse digital business models including platforms, marketplaces and subscriptions.
- Apply permanent establishment and profit attribution concepts to digital operations.
- Prepare HTVI documentation and defend positions during audit or dispute.
- Design an internal policy covering risk allocation and intangible pricing.

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Course Methodology

The course combines technical briefings with valuation workshops and dispute case simulations. Participants assess HTVI cases, allocate risk across group entities and defend positions before a mock tax panel. In addition, structured peer review and group debate sharpen technical judgement, and each day closes with an applied case task.

Who Should Take This Course

- Transfer pricing and international tax specialists.
- Valuation and corporate finance professionals.
- Group tax directors in technology and digital businesses.
- Accounting firm managers handling intangible and risk projects.
- Dispute resolution, audit defence and competent authority staff.
- Economists working on profit attribution and intangible valuation.

Hard-to-Value Intangibles (HTVI), Risk Allocation & Digital Business Models Course Outlines

Day 1: The HTVI Framework and Intangible Categories

- OECD guidance on hard-to-value intangibles and its purpose.
- When ex post outcomes may adjust an ex ante price and the exceptions.
- Categories of intangibles: patents, know-how, brands and data.
- Partially developed intangibles and future development rights.
- Information asymmetry between taxpayers and tax authorities.
- Interaction between HTVI rules and domestic legislation.

- Workshop: classifying a transaction under the HTVI framework.

Day 2: DEMPE Analysis and Intangible Profit Allocation

- DEMPE analysis: development, enhancement, maintenance, protection and exploitation.
- Legal ownership versus economic ownership of intangibles.
- Allocating returns across performing, funding and risk-bearing entities.
- Cost contribution arrangements for shared development.
- Royalty benchmarking and transactional profit split approaches.
- Compensation for intangible transfers and restructuring.
- Workshop: allocating intangible returns in a complex group.

Day 3: Risk Allocation and Risk-Adjusted Returns

- OECD risk framework: identification, assumption and management of risk.
- Contractual versus conduct-based risk allocation.
- Risk-free returns, risk-adjusted returns and entrepreneurial returns.
- Funding entities and the profit they can reasonably expect.
- Risk mitigation, control functions and decision-making authority.
- Documenting risk allocation to support the pricing position.
- Workshop: testing whether a group's risk allocation matches conduct.

Day 4: Valuing Hard-to-Value Intangibles

- Income approach: cash flow forecasting, discount rates and useful life.
- Market approach: comparables for intangibles and royalty rates.
- Cost approach and its limits for unique intangibles.
- Probabilistic methods including Monte Carlo simulation and decision trees.

- Handling uncertain projections and information asymmetry.
- Valuation documentation and expert evidence requirements.
- Workshop: valuing an intangible with a probabilistic model.

Day 5: Digital Business Models, PE Risk and Dispute Defence

- Digital platform, marketplace and subscription business models.
- User data, network effects and value creation in digital groups.
- Permanent establishment concepts and profit attribution to digital operations.
- Interaction with pillar two and digital economy tax measures.
- Preparing HTVI documentation and responding to queries.
- Dispute routes: mutual agreement procedures and advance pricing agreements.
- Workshop: defending an HTVI position before a mock tax panel.

Conclusion

By successfully completing Hard-to-Value Intangibles (HTVI), Risk Allocation & Digital Business Models Training Course, participants will have acquired the knowledge to price, document and defend positions on genuinely uncertain intangibles. They will understand the HTVI framework, DEMPE analysis, risk allocation, valuation techniques and digital business model taxation, and they will know how to answer authority challenges with evidence. As a result, delegates strengthen their group's position in the hardest transfer pricing disputes. Gentex Training Center builds the programme around current OECD practice.

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FAQs for the Hard-to-Value Intangibles (HTVI), Risk Allocation & Digital Business Models course

Q1 What is the "Hard-to-Value Intangibles (HTVI), Risk Allocation & Digital Business Models" course about?

It covers three linked transfer pricing problems. You learn the OECD HTVI framework, DEMPE and risk allocation, intangible valuation techniques and digital business model taxation, then defend positions on uncertain intangibles using documented evidence.

Q2 What are the key benefits of the "Hard-to-Value Intangibles (HTVI), Risk Allocation & Digital Business Models" course?

You gain the technical depth to defend contested intangible pricing rather than conceding adjustments. You also improve risk allocation documentation, strengthen valuation support, and prepare more convincing responses to authority challenges and ex post outcome questions.

Q3 What skills will I gain from the "Hard-to-Value Intangibles (HTVI), Risk Allocation & Digital Business Models" course?

You will gain HTVI framework application and analysis, DEMPE and risk allocation analysis, intangible valuation using income, market and probabilistic methods, and digital business model and dispute defence skills.

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Q4 What tools, methods, or standards are covered in the "Hard-to-Value Intangibles (HTVI), Risk Allocation & Digital Business Models" course?

The course covers OECD guidance on hard-to-value intangibles, the OECD risk framework, DEMPE analysis, cost contribution arrangements, royalty benchmarking and the transactional profit split method, income, market and cost valuation approaches, Monte Carlo simulation and decision trees, permanent establishment profit attribution, and mutual agreement procedure and advance pricing agreement frameworks.

Q5 How is the "Hard-to-Value Intangibles (HTVI), Risk Allocation & Digital Business Models" course applied in real-world practice?

Graduates apply it to structure intangible ownership and development rights, set and defend royalty rates, document risk allocation across group entities, prepare valuation evidence for audit and dispute, assess permanent establishment exposure on digital operations, and support advance pricing agreement discussions.