



In this article, the authors have discussed the key transfer pricing aspects surrounding intangibles, intangible definition, attribution of ownership, MNE group synergies, specific market circumstances, and challenges surrounding the acquisition, development transfer, and exploitation of intangibles. The authors have laid emphasis on the new OECD Guidance on intangibles which concerns the allocation of intangible-related returns to the MNE group members performing DEMPE activities. BRIEF BACKGROUND Over the last few years, intangibles/intellectual property (IP) has not only been the most important topic of discussion but also the most widely debated topic among transfer pricing ('TP') professionals, multilateral organizations (like OECD), tax administrations, and taxpayers. Historically, the intangibles/IP have created several com.....