

# Content

Preface .....	V
List of authors .....	XI

## Introduction

<i>Karol Adam Dziwiński/Claire (Xue) Peng</i>	
Introduction to the post-BEPS transfer-pricing aspects of intangibles .....	3

## Chapter I

### Defining intangibles

<i>Ronald van den Brekel</i>	
Defining intangibles – an introduction .....	27

<i>Karol Dziwiński/Mario Riedl</i>	
Defining intangibles – panel discussion and case study .....	35

## Chapter II

### Attribution of intangible-related returns

<i>Martin Lagarden</i>	
Attribution of intangible-related returns – case study .....	51

<i>Florian Navisotschnigg</i>	
Attribution of intangible-related returns – panel discussion .....	77

## Chapter III

### Structuring intangibles

<i>Cornelia Andree/Daniel Liebchen</i>	
Structuring intangibles .....	87

<i>Karol Dziwiński</i>	
Structuring intangibles – panel discussion .....	123

## Chapter IV

### Valuation of intangibles

<i>Emmanuel Llinares/Ralph Meghames</i>	
Hard to value intangibles .....	133

## Content

*Sayee Prasanna*

Valuation of intangibles – panel discussion .....	145
Series on International Tax Law.....	151
Index.....	157