

Tax Management Group

Academic Report 2015–2017

Institute for Accounting & Auditing



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Introducing the Group

This is who we are

INTRODUCTION

This report includes an overview of our group's activities in the 2015/16 and 2016/17 academic years, and is written for the benefit of both colleagues and students, as well as those who work in related fields in the private and public sectors. We briefly introduce the staff and research areas of the Tax Management Group of WU, chaired by Prof. Dr. Eva Eberhartinger, part of the Institute for Accounting and Auditing at Vienna University of Economics and Business. Aside from Tax Management, the Institute for Accounting and Auditing also includes the Financial Accounting and Auditing Group (Prof. Dr. Romuald Bertl), the Management Accounting and Control Group (Prof. Dr. Christian Riegler), the Accounting, Taxation and Auditing Group (Prof. Dr. Klaus Hirschler), and the International Accounting Group.

The teaching activities of the Tax Management Group focus on (corporate) tax norms, effects, and structures. We prepare students for careers as tax consultants, but also for careers in in-house corporate tax departments, financial institutions, and financial management organizations, as well as in accounting-related professions. Beyond merely acquiring relevant expertise in tax and accounting, students learn how to independently devise new solutions to corporate tax issues which may arise from changes in the tax code. Both the seminars and the master's thesis provide students with the opportunity to conduct tax

research. At the same time, however, the focus remains on practical applications. This is ensured by coursework and research, as well as through the curriculum design and various cooperative undertakings with law firms and companies.

The Tax Management Group, together with other departments and institutes of WU, supports degree programs at all levels: the specialization track "Accounting and Taxation" in the bachelor's program, and the master's degree programs in Finance and Accounting and in Taxation and Accounting. In addition to its regular doctoral program, the department also offers the Doctoral Program in International Business Taxation (DIBT). This program has been offered since 2011 and was extended in 2014, funded by the Austrian Science Fund (FWF).

Members of the Tax Management Group have contributed extensively to the research areas of tax accounting, cross-border taxation, and European group taxation, as well as legal structuring. Their research papers have been presented at various domestic and international conferences, and the group can boast numerous publications in Austria and abroad.

We are pleased to provide insight into our work in both teaching and research, as follows.

FACULTY (AS OF JUNE 2017)

The group's staff are introduced here. For more details on each person's research interests and publications, click on her or his name; the hyperlink will directly guide you to the respective section of the report.



PROF. DR. EVA EBERHARTINGER, LL.M. (EXETER)

has been the chair of the group since 2002. She studied business administration at the University of Linz and obtained her PhD at WU. She held positions as visiting professor at HEC Paris and as full professor at the University of Münster in Germany. She held visiting positions at the University of Illinois at Urbana-Champaign (USA), University of Exeter (UK), HEC (France), HEC Montréal (Canada), McGill University (Canada), the University of Malta, and Macquarie University (Australia). From 2006 to 2011, she was the Vice-Rector for Financial Affairs at WU. In her research, she focuses on the effects of taxation on transnational issues in companies, the effect of tax on corporate finance, and the link between tax law and accounting law in the context of determining taxable income.



ASST.PROF. DR. MATTHIAS PETUTSCHNIG

is an Assistant Professor post-doc (since January 2013). Prior to that, he was with a large Austrian accounting and tax consulting firm. He holds a Magister diploma in economics and law and a doctorate in social and economic sciences, both from WU. His dissertation on the EU Common Consolidated Corporate Tax Base proposal received awards from the Austrian Theodor Körner Fonds and the German Chamber of Tax Consultants. He held visiting positions at Singapore Management University and North Carolina State University (USA). In his current research projects Dr. Petutschnig focuses on consolidated taxation regimes, the OECD BEPS Action Plan, and capital gains taxation, among other topics.



DR. HARALD AMBERGER

is a research assistant and obtained his PhD at WU from the Doctoral Program in International Taxation (DIBT). He holds a master's degree in finance and accounting from WU. He spent one semester at the University of Western Australia. His research interests lie in the effect of taxes on real corporate decisions (e.g., financing decisions, organizational form choices, payout policy) and he applies empirical methods. During his PhD studies, he spent one semester as a visiting researcher at the University of Iowa. He is a guest researcher at the Deutsche Bundesbank.

**TOBIAS BORNEMANN, MSC LL.M.**

has been a research assistant since September 2016 and has been enrolled in the DIBT since September 2013. He studies business economics with focus on international business taxation at the University of Paderborn in Germany, as well as international and European tax law at Lund University in Sweden. During his studies he worked for a large tax consulting firm, as well as in the automobile sector. He held visiting positions at the University of Uppsala (Sweden) and Oxford University (UK). In his dissertation Tobias analyzes the effects of taxation on firms' innovation.

**MICHAEL BRIGHTWELL, MSC (WU)**

is University Assistant, externally funded by Moore Stephens MSVIE connect. He holds a master's degree in taxation and accounting. During his studies, he and his team won the International & European Tax Moot Court 2015/2016 competition in Leuven (Belgium). Currently, his research focuses on the taxation of real estate in Austria, as well as Austrian and international corporate taxation, with a special focus on start-up companies.

**STEFANIE CHROUSTOVSKSY**

has been working as a student assistant since November 2015. Her range of responsibilities include supportive work in teaching, research, and administration. In addition, she contributes to the support of the "Accounting and Taxation" specialization. She spent a five-month research internship at the OECD in Paris. She will complete her bachelor's degree in business law at WU in summer 2017.



NADIA GENEST, LL.M.

was born in Canada. She studied both business administration with specialization in accounting and management, as and received a Master of Laws (LLM) with a specialization in taxation from HEC Montreal (Canada). Nadia is a Chartered Professional Accountant and has more than five years' experience as a tax consultant in Canada, where she advised corporations and individuals on various matters related to Canadian taxation. Additionally, she served as a full-time lecturer in the field of taxation for the Department of Accounting Studies at HEC Montreal. Since September 2015, she has been studying in the DIBT at WU.



JAN KNESL, MSC (WU)

studied taxation and accounting at WU. He began his career at WU as a student assistant with the Tax Management Group. Since September 2015, he has been working as an externally-funded (KPMG) research assistant. His main research areas are limitations of base erosion and profit shifting involving interest payments, with a special focus on banks.



PATRICK LEYRER, MSC (WU)

completed the master's program taxation and accounting at WU in January 2016. Since March 2016, he has been working as university assistant, financed by BDO, in our Group. During his bachelor's and master's studies, he worked with a local tax consulting firm. The focus of his dissertation is the taxation of a usufruct.



KATHARINA LUKA, MSC (WU)

has been working as a teaching and research associate (externally funded by Deloitte) in the Tax Management Group since September 2015 after she finished the master's program in finance and accounting at WU. In addition, she is a tax advisor trainee at Deloitte. Her doctoral thesis deals with the impact of BEPS Action 4 on the tax treatment of leases, with the aim of identifying a taxation scheme that reduces the tax burden for companies while also taking into account the prevention of base erosion and profit shifting.

**DR. STEPHANIE NOVOSEL**

finished her doctoral studies at WU in September 2016 with a major in accounting. After finishing her doctoral studies, she has continued working as an externally funded (by BDO) teaching and research associate in the Tax Management Group. She began working as a tax associate at BDO in 2011 and completed the examination procedure to become a tax manager in March 2017. In her dissertation project, she deals with the taxation of partnerships in Austria and Germany, as well as the international aspects of partnership taxation. In her further research work, she focuses on current issues regarding business taxation and the effects of changes in tax law on the taxation of businesses.

**DIPL.-KFM. BENJAMIN OSWALD**

studied business administration at the University of Bayreuth (German). After graduating, he gained professional experience in technology management. Since September 2014, he has been studying for his doctorate degree in the DIBT. He was a visiting scholar at the University of Wisconsin-Madison from January to June 2017. His research interests lie in the field of research and development tax incentives, tax avoidance, and tax risk.

**DR. ALEXANDRA PATLOCH-KOFLER**

is a teaching and research associate in the Tax Management Group. After her studies in finance and accounting, she joined a large tax consulting firm. She returned to WU for research and finalized her dissertation in 2016. Her research focus is the effect of tax on executive compensation. She is also the author of several research papers on domestic taxation and its effects on management decisions.



MAG. SABINE RETTIG

worked for two years in the International Accounting Group at WU. Since October 2016, she has been working in the Tax Management Group. She is the coordinator of all administrative and organizational issues. Besides being Prof. Eberhartinger's personal assistant, Sabine is responsible for various organizational tasks, such as the group's budget administration, assistance for students, and organizing the group's website and teaching activities.



DAVID SAMUEL, MSc (WU)

graduated with a BSc in business administration from the University of Mannheim (Germany). During his graduate studies at WU (MSc in strategy, innovation, and management control), he focused on finance and accounting, corporate governance, and entrepreneurship. Moreover, he gained insights into the work of UNIDO during an internship at its Vienna headquarters. In 2015, he began his PhD studies (DIBT). His research interests are corporate and entrepreneurial finance, corporate taxation, international taxation, and taxation of the financial sector. He also studied in Spain and the United Kingdom.



DR. STEFAN WEINHANDL

has been working in the Tax Management Group since September 2013 as a research assistant. He is externally funded by Mag. Dr. Weinhandl & Engelbert Katt WT-KG, the tax advisory company. In his dissertation, he empirically analyzed case law on corporate income tax and formal legal protection rules. He received his doctorate degree in September 2016. In his future research, he will focus on domestic and international taxation, as well as an empirical analysis of case law.

GUEST FACULTY AND VISITING RESEARCHERS

Prof. Scott Dyreng (Duke University, USA)	visited our group twice (2014 and 2016) and offered workshops for our PhD students. He was also a member of a PhD defense committee.
Prof. Dr. Henriette Houben (HU Berlin)	presented her research at our Institute and offered a master's thesis seminar (both during the summer semester 2016).
Prof. Petro Lisowsky (University of Illinois at Urbana-Champaign, USA)	visited our group for the second time in May 2017 to offer a research seminar and presented his research at our Institute. He was also a member of Dr. Amberger's PhD defense committee.
Prof. Suzanne Paquette (Université Laval, Canada)	visited our group in summer 2016 to pursue several research projects.
Prof. Dr. Caren Sureth-Sloane (University of Paderbon and WU)	is a part-time professor in our group and a DIBT faculty member.

PAST FACULTY MEMBERS

Benedikt Brand, BSc (WU)	worked as student assistant at our group until summer 2015
Dr. Gudrun Geutebrück	successfully defended her dissertation in December 2015.
Elisabeth Hager, Bakk. phil.	left WU after working for more than ten years as administrative assistant and secretary in the Tax Management Group. She joined Johannes Kepler University in Linz.
Carmel Said Formosa, PhD	graduated from WU with a PhD in international business taxation in June 2015 and is now teaching at the University of Malta.
Soojin Lee, PhD	graduated from WU with a PhD in international business taxation in summer 2015 and works now as a senior research associate at IBFD (Amsterdam).
Marlies Muck, BSc (WU)	worked as student assistant at our group until summer 2015



Teaching

We offer classes in the bachelor's, master's, and PhD programs.

BACHELOR'S PROGRAM: SPECIALIZATION IN ACCOUNTING AND TAXATION

The specialization in accounting and taxation is overseen by the Institute of Accounting and Auditing. It provides third-year students with an in-depth education, in which they obtain the insightful knowledge needed for work in the fields of tax consulting and auditing, as well as in the finance, accounting, auditing, and tax departments of companies.

The syllabus covers two main areas: financial reporting and tax management. Courses I and II are continual assessment courses and may be completed only sequentially (Course I in the first semester, followed by Course II in the second semester). This specialization concludes with a final written examination. All courses in this specialization are offered in both winter and summer terms.

The Tax Management Group oversees the specialization courses Accounting and Tax (Course I), Investment, Finance, and Taxes (Course III), and Tax Statements and Tax Management (Course IV), as well as supervises bachelor's theses.

For further information, please refer to the website:
[wu.ac.at/accounting/lehre/sbwl-rechnungslegung-und-steuerlehre](https://www.wu.ac.at/accounting/lehre/sbwl-rechnungslegung-und-steuerlehre)

CLASSES OFFERED IN MASTER'S PROGRAMS

The Tax Management Group teaches classes in two master's programs. Moreover, we supervise master's theses written by students enrolled in either program.

Master's Program in Finance and Accounting

The Tax Management Group teaches the following courses in the Master's Program in Finance and Accounting (click on the class to be directed to the university's course register, which contains a detailed description for each class): Accounting and Taxes, International Tax Management, and the master's thesis seminar.

Further information about the master's program in general can be found on its website:
[wu.ac.at/programs/master/fire](https://www.wu.ac.at/programs/master/fire)

Master's Program in Taxation and Accounting

The Tax Management Group teaches the following classes in the Master's Program in Taxation and Accounting (click on the class to be redirected to the university's class register with a detailed description for each class): Introduction Taxation and Accounting, Introduction to Tax Management, Investment, Finance & Taxation, International Tax Management, Business Taxation Seminar, and the master's thesis seminar.

Further information about the master's program in general can be found on its website:
[wu.ac.at/programs/master/strel](https://www.wu.ac.at/programs/master/strel)

Supervised master's theses

All master's students must submit a master's thesis. Through the master's thesis, students are able to demonstrate their ability to independently delve into relevant topics using appropriate scientific research methods. The following master's theses were supervised by the group and were successfully completed between 2015 and 2017:

Bauer, N.: Auswirkungen einer Liquidation auf die Unternehmensgruppe iSd § 9 KStG (2016).

Bauer, E.: Die Bewertung von Grundvermögen für steuerliche Zwecke: Anforderungen an das Bewertungsverfahren, historischer Abriss und internationaler Vergleich (2016).

Besin, A.: Die Behandlung von Auslandsverlusten in der Rechtsprechung des EuGH (2016).

Bilandzija, N.: Gewinnermittlung der Bau-Betriebsstätte (2016).

Buchinger, R.: Der Handel mit Emissionszertifikaten im Bilanzrecht, Ertragsteuerrecht und DBA-Recht (2015).

Führer, S.: Höchstpersönlichkeit von über Kapitalgesellschaften erzielten Einkünften (Rz 104 EStR) vs. VwGH 4.9.2014, 2011/15/0149 – Irrweg oder Rückkehr zu dogmatischen Grundsätzen? (2015).

Gaich, M.: Land- und Forstwirtschaften ab 2015: Steuerliche Auswirkungen der Land- und Forstwirtschaft-Pauschalierungsverordnung 2015 und der Hauptfeststellung der Einheitswerte (2015).

Gazso, C.: Factoring und wirtschaftliches Eigentum (2015).

Graussam, A.: Einlagenrückzahlungen, Gewinnausschüttung und Evidenzkonten nach dem StRefG 2015/2016 und dem AbgÄG 2015 (2016).

Hahn, V.: Analyse der Wegzugsbesteuerung in Österreich unter Berücksichtigung etwaiger Zweifelsfragen (2016).

Haidl, T.: Zinsen und Lizenzgebühren im Konzern – BEPS-Report und erste Umsetzungsschritte in Österreich und Frankreich (2015).

Hainz, E.: Die Besteuerung von Deferred Compensation in Österreich und Deutschland (2015).

Heger, S.: Internationale Einbringung – Anwendung und Grenze der Buchwerteinbringung (2015).

Heidegger, J.: Die Auswirkungen des RÄG 2014 auf den Ansatz und die Bewertung von Rückstellungen sowie die daraus resultierenden bilanzpolitischen Gestaltungsmöglichkeiten (2015).

Herold, L.: Earn-Out-Vereinbarungen im Zivil-, Unternehmens- und Steuerrecht (2015).

Hinterhauser, S.: Vorsorge gegen die endgültige Verschiebung stiller Reserven bei Zusammenschluss und Realteilung – Grundsätzliche Bedeutung und Neuerungen infolge 1. StabG 2012 bis 2. AbgÄG 2014 (2015).

Kasser, D.: Wertaufholung nach zwischenzeitiger Einbringung – unternehmensrechtliche und steuerrechtliche Bewertung (2015).

Kogler, B.: Die Verrechnung von Sicherheiten im Konzern aus betriebswirtschaftlicher und steuerrechtlicher Sicht (2015).

Kostadinova, M.: Steuern als wirtschaftspolitische Maßnahmen zur Beeinflussung von Managergehältern (2016).

Leinfellner, P.: Die Behandlung von Zuschüssen im UGB und STR (2016).

Leyrer, P.: Spezielle Steuerregime – Eine Analyse ehemaliger und bestehender IP-Box-Regime in der Europäischen Union und im Europäischen Wirtschaftsraum (2016).

Matkovits, F.: Die Neutralisierung der Effekte hybrider Gesellschaften im Lichte von BEPS (2015).

Mayr, S.: Zu den Anforderungen an eine Vermögensbewertung für steuerliche Zwecke unter besonderer Berücksichtigung von Unsicherheit (2016).

Muck, M.: Effektivität der steuerlichen Förderung von Forschungs- und Entwicklungsaktivitäten von Unternehmen – eine kritische Analyse (2015).

Pasquin, O.: Die Besteuerung von Vermögen in Europa: gegenwärtiger Stand und Rechtfertigung (2016).

Petrova, D.: Bilanzierung von Beteiligungen an Personengesellschaften (2015).

Pöschl, C.: Die Begründung und Beendigung eines gewerblichen Grundstückshandels (2015).

Preiner, S.: Die Gewinnabgrenzung zwischen Betriebsstätte und Stammhaus unter Berücksichtigung des AOA und dessen Auswirkungen auf die österreichische DBA-Praxis (2016).

Prossnitsch, M.: Tax on immovable property in connection with non-profit corporations (2016).

Ramharter, L.: Einlagen, Einlagenrückzahlungen und Evidenzkonten bei Umgründungen (2016).

Ribisch, S.: Der Steueraufwand im UGB Abschluss nach dem RÄG 2014 (2015).

Schaufler, N.: Steuerliche Behandlung von Hochrisiko Investitionen im Bereich Forschung und Entwicklung: Ein Vergleich anhand ausgewählter Länder (2016).

Schwaighofer, A.: Sanierung einer verdeckten Gewinnausschüttung durch Bilanzänderung oder Bilanzberichtigung? (2015).

Sebestyen, R.: Bilanzsteuerrechtliche Auswirkungen des RÄG 2014 auf außerplanmäßige Abschreibungen und Zuschreibungen (2015).

Steininger, C.: Saldierbarkeit von Verpflichtungen mit Gegenforderungen bei der Rückstellungsbildung was hat sich seit dem Großen Senat des BFH aus 1997 getan? (2015).

Thurnher, N.: Der Verlustvortrag bei unentgeltlichen Vermögensübergängen im Wandel der Rechtsprechung des VfGH und des VwGH – von der Subjektbezogenheit zur Objektbezogenheit (2016).

Tölsner, M.: Auswirkungen der OECD Base Erosion and Profit Shifting (BEPS) Maßnahmen auf Forschungs- und Entwicklungsaktivitäten von Unternehmen in Europa (2015).

Walcher, S.: Die steueroptimale Finanzierung von Tochterkapitalgesellschaften im Ausland (2016).

Wondra, D.: Der Großmutterzuschuss zu Sanierungs- oder Investitionszwecken im Ertragsteuer- und Gesellschaftsteuerrecht – Grundsätze und Ausnahmen anhand der Rechtsprechung (2015).

Zauner, F.: Ertragsteuerliche Folgen der Rechtsformwahl: Die Steuerbelastung ausländischer Direktinvestments ausgehend von einer in Deutschland ansässigen Kapitalgesellschaft (2015).

Zotter, M.: Der Anteilsvereinigungstatbestand (§ 1 Abs 3) und der neue Anteilsverschiebungstatbestand (§ 1 Abs 2a) im neuen Grunderwerbsteuerrecht ab 1.1.2016 – Vergleich der Systeme alt und neu (2016).

Zyla, N.: Änderungen der Gebäudeabschreibung durch das Steuereformgesetz 2015/16 (2016).

Fireside Chats

Exclusively for our master's students we regularly organize fireside chats with our partner firms. Here, practical applications and current issues in tax law are presented and discussed in cooperation with the tax consultants and auditors of the firms. We have organized the following events:

- › Fireside chat on the **tpa** "Steuerreform 2015/2016"
- › Kick-off session for the Master's Program in Taxes and Accounting, sponsored by **KPMG**
- › Fireside chat with **BDO**



DOCTORAL STUDIES

General PhD Program at WU

The Tax Management Group, together with the Financial Accounting and Auditing Group and the Management Accounting and Control Group, offers a research seminar where current research and findings are presented and discussed with the doctoral candidates.

Furthermore, the Tax Management Group offers an additional research seminar for doctoral candidates which looks at particular questions regarding tax management, including balance sheet accounting, with a special focus on fundamentals of methods and scientific theory.

Structured Program: Doctoral Program in International Business Taxation

The Doctoral Program in International Business Taxation (DIBT) is financed to a large extent by the Austrian Science Fund (FWF) and it took on its program in October 2011. In fall 2014, it was subject to an interim evaluation by the FWF. Based on the positive evaluation of recent research and teaching, financing of the DIBT has been extended for another funding period (six years).

The DIBT provides qualified students from any country high quality, interdisciplinary, scientific training in the field of international business taxation. The training essentially takes place across the three core disciplines dealing with taxes:

- › tax law: Prof. Lang, Prof. Schuch, Prof. Staringer, and Prof. Pistone (all WU);
- › tax management: Prof. Eberhartinger (WU) and Prof. Sureth-Sloane (WU and University of Paderborn); and
- › economics: Prof. Zagler and Prof. Sausgruber (both WU), Prof. Weichenrieder (University of Frankfurt), and Prof. Wagener (University of Hannover).

In addition, tax psychology is prominently represented by Prof. Kirchler (University of Vienna).

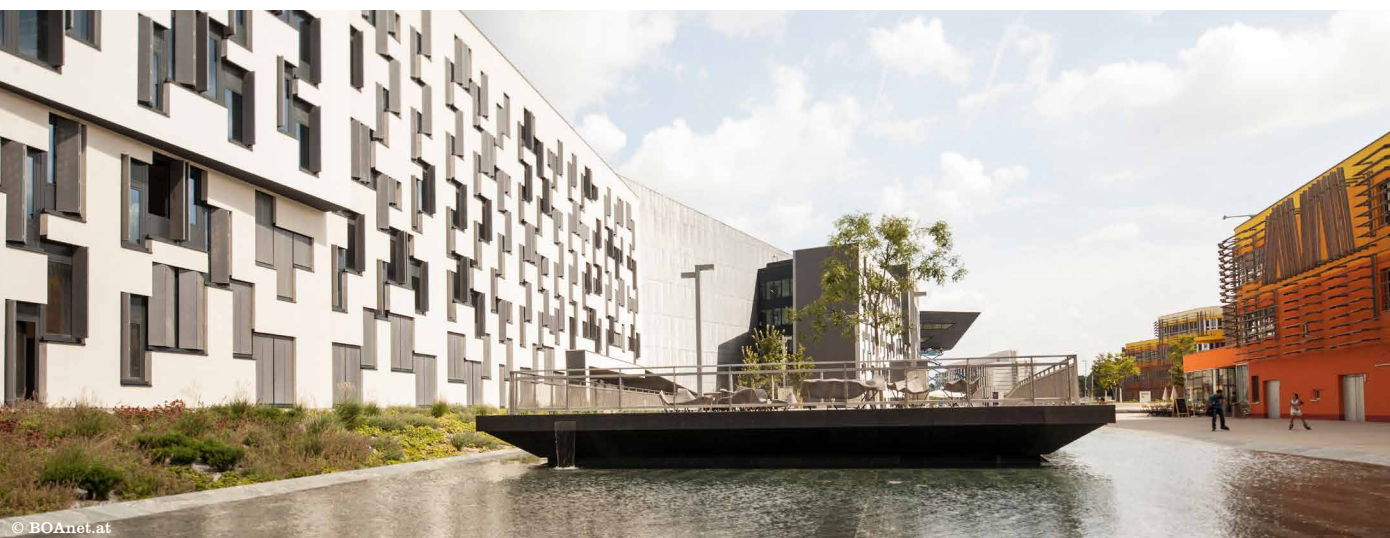
By combining these core subjects with the areas of tax history, political science, tax ethics, organizational and decision management, and methodology, a holistic education in taxation is offered.

For further information, please visit:

wu.ac.at/dibt

and

**[fwf.ac.at/de/wissenschaft-konkret/
im-fokus-doktoratskollegs/w1235](http://fwf.ac.at/de/wissenschaft-konkret/im-fokus-doktoratskollegs/w1235)**



Supervised Dissertations

Prof. Eberhartinger is continuously supervising dissertations written as part of the WU general PhD program, as well as part of the structured PhD program (DIBT). From 2015 through 2017, the following dissertations were successfully completed under her supervision or co-supervision:

Amberger, H.: The Effect of Taxes on Real Corporate Decisions (2017)

Geutebrück, G.: Aktuelle Entwicklungen in der Besteuerung von grenzüberschreitenden Lieferungen digitaler Güter und Leistungen zur Bekämpfung von Gewinnverkürzung und Gewinnverlagerung (BEPS) (2016)

Hasanovic, M.: Wirtschaftliches Eigentum an Kapitalanteilen (2015)

Haselsteiner, K.: Die vermögensverwaltende Personengesellschaft in der Rechnungslegung und im Ertragsteuerrecht – Gemeinsamkeiten und Unterschiede (2016)

Knapp, V.: Bilanzierung von Umgründungen – Quo vadis? – Zum Bedarf einer systematischen Neuordnung (2016)

Kohlhase, S.: Studies on Financial Reporting and Taxation (2016)

Novosel, S.: Steueroptimale Rechtsformwahl bei operativen Tätigkeiten deutscher Personengesellschaften in Österreich – Eine umfassende Analyse steuerlicher Wirkungen in Abhängigkeit der Rechtsform (2016)

Pankiv, M.: Contemporary application of the arm's length principle in transfer pricing (2016)

Patloch, A.: Die Determinanten der Vorstandsvergütung unter spezieller Berücksichtigung der steuerlichen Abzugsbeschränkung von Gehältern (2016)

Pühra, I.: Die Auswirkung von Steuereffekten auf die interne Verrechnungspreisausgestaltung im Hinblick auf Istkosten- und Standardkostenbasierte Verrechnungspreise (2016)

Schwarzecker, H.: Unternehmenscharakteristika und freiwillige Unternehmensberichterstattung – Eine empirische Analyse der Auswirkung von verschiedenen unternehmensseitigen Einflussvariablen auf den Informationsgehalt der freiwilligen Unternehmensberichterstattung der österreichischen ATX-Prime Unternehmen im Zeitraum 2002–2014 (2016)

Stiastny, M.: Horizontal Monitoring – Rechtsgrundlagen in der österreichischen Steuerrechtsordnung (2015)

Weinhandl, S.: Die finanzgerichtliche Rechtsprechung zur Körperschaftsteuer in der Praxis: Eine empirische Analyse unter Berücksichtigung des formellen Rechtsschutzes (2016)





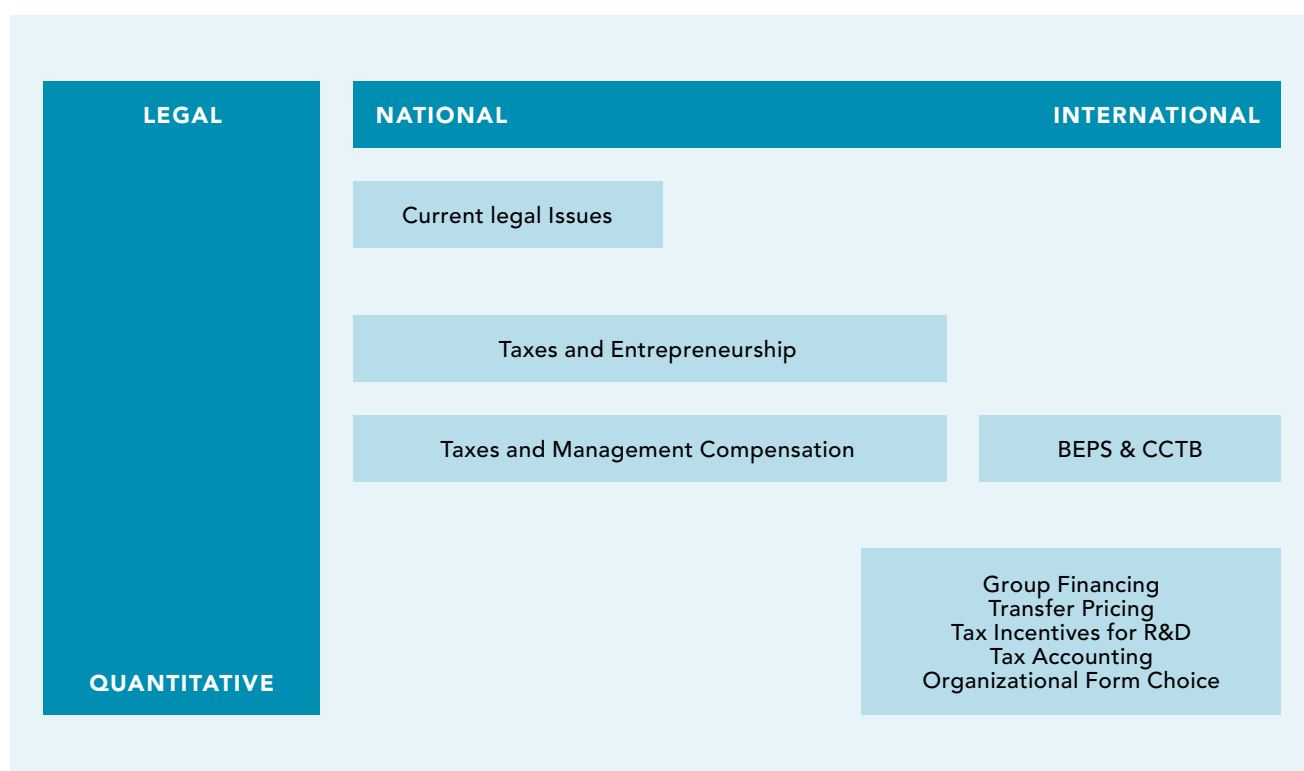
Research

Our research covers a broad range of topics in taxation

RESEARCH OF THE GROUP

The group's research focus is on the effect of taxes on corporate decisions, with a particular focus on financing and investment decisions, as well as on tax

accounting issues. We work on these questions from both an international and national perspective, and use legal as well as empirical (empirical-archival, empirical-experimental, and analytical) methods.



EDITORSHIPS

The annual conference series **Wiener Bilanzrechtstage** has been taking place at WU since 2000 and is cooperatively organized by the Institute of Accounting, the Institute for Austrian and International Tax Law, the Institute for Public and Corporate Law, and the Academy of Auditors (Akademie der Wirtschaftstreuhänder). In 2015, the conference focused on the accounting reform in Austria. In 2016 and 2017, the main topics were fraudulent behavior in accounting and taxation and hybrid financing structures, respectively. Findings relevant to science and the field will be made available for a wide audience through contributions to an anthology. Prof. Eberhartinger is a co-editor of the annual anthology, along with other recognized experts from the scientific and practical field.

Prof. Eberhartinger is a member of the editorial board of the journal *Accounting in Europe* and a reviewer of scientific contributions of the journal **Zeitschrift für Recht und Rechnungswesen** (RWZ; Journal of Law and Accounting). Furthermore, she is a reviewer of scientific articles for numerous international periodicals (including *AinE*, *EAR*, *Finanzarchiv*, *DBW*, and *ZfB*) and conferences (including *EAA* and *VHB Annual Meeting*). Moreover, various members of the group also review articles for national and international journals and conferences.

COOPERATIVE UNDERTAKINGS WITH BUSINESS

The Tax Management Group aims to foster the exchange of ideas between science and practice. An essential part of this is cooperation with international auditing and tax consulting businesses, as well as companies. The close collaboration is profitable not only for students and companies, but also for teaching. It allows the students to directly engage with practice-relevant questions and benefit from feedback.

The Master's Programs in Taxation and Accounting and in Finance and Accounting offer seminars for students in cooperation with the international auditing and tax consulting firms **BDO**, **Deloitte**, **KPMG**, and **TPA**, which take place on the premises of the respective firms. Moreover, **Telekom Austria Group** is one of our seminar partners.

In addition, there is a close cooperation with the auditing and tax consulting firms **BDO**, **Deloitte**, **KPMG**, **Moore Stephens MSVIE connect** and **Mag. Dr. Weinhandl & Katt WT-KG**, which all support the financing of research and teaching assistants.

RESEARCH PROJECTS OF THE FACULTY

PROF. DR. EVA EBERHARTINGER, LL.M. (EXETER) RESEARCH FOCUS

Prof. Eberhartinger's research covers a broad area of issues in both national and international taxation. Currently, her focus is on the following areas.

Effects of taxation on multinational corporations

This area includes consolidated corporate taxation as discussed in the EU (CCCTB) proposal, as well as effects of the recent discussion on curtailing base erosion and profit shifting (BEPS).

Taxes and finance

The taxation of intra-group financing, as well as the taxation of external corporate financing, hybrid financing, and behavioral scientific explanations of non-tax-optimal financing decisions are part of this research field.

Deferred tax

As a result of the Austrian Accounting Act 2014 (RÄG), accounting for deferred taxes has changed fundamentally. Internationally, IAS 12 and the associated requirements for disclosure are constantly evolving and require further consideration. To this end, the benefits of additional disclosure are of particular interest for further research.

PUBLICATIONS AND PRESENTATIONS

Contributions to Journals

Eberhartinger, E., & Petutschnig, M. (2017). CCCTB – The Employment Factor Game. *European Journal of Law and Economics*, 43(2), 333–358.

Eberhartinger, E., & Petutschnig, M. (2017). The Dissenting Opinion of BRICS Practitioners on the BEPS Agenda. *Australian Tax Forum*, 32(1), 1–57.

Eberhartinger, E., & Novosel, S. (2017). Wirtschaftliches Eigentum und die Zurechnung von Forderungen beim Factoring. *RWZ – Zeitschrift für Recht und Rechnungswesen*, (2), 51–57.

Eberhartinger, E., & Fellner-Röhling, G. (2016). Why don't they minimize their tax? An experimental approach to complexity and uncertainty. *Die Betriebswirtschaft (DBW)*, 76(2), 169–186.

Eberhartinger, E., & Petutschnig, M. (2015). Latente Steuern "NEU". *RWZ – Zeitschrift für Recht und Rechnungswesen*, (7–8), 250–259.

Editorship of Anthologies

Bertl, R., Eberhartinger, E., Egger, A., Hirschler, K., Kalss, S., Lang, M., Nowotny, C., Riegler, C., Rust, A., Schuch, J., Staringer, C. (Eds.). (2016). Fehler und Fehlverhalten in Bilanz- und Steuerrecht, Wiener Bilanzrechtstage 2016. Vienna: Linde Verlag.

Bertl, R., Eberhartinger, E., Egger, A., Riegler, C., Kalss, S., Lang, M., Nowotny, C., Schuch, J., Staringer, C. (Eds.). (2016). Reform der Rechnungslegung in Österreich. Vienna: Linde Verlag.

Bertl, R., Djanani, C., Eberhartinger, E., Hirschler, K., Kanduth-Kristen, S., Kofler, G., Tumpel, M., Urnik, S. (Eds.). (2015). Handbuch der österreichischen Steuerlehre Band I Teil 1: Theorien und Methoden, Steuerarten und Abgabenverfahren (4th Edition). Vienna: LexisNexis.

Bertl, R., Eberhartinger, E., Egger, A., Kalss, S., Lang, M., Nowotny, C., Riegler, C., Schuch, J., Staringer, C. (Eds.). (2015). Reform der Rechnungslegung in Österreich, Wiener Bilanzrechtstage 2015. Vienna: Linde Verlag.

Contributions to Anthologies

Eberhartinger, E., & Patloch, A. (2015). Definition of Income Taxes. In Bakker, A., van den Berg, T., & Janssen, B. (Eds.), *Tax Accounting: Unravelling the Mystery of Income Taxes* (pp. 47–62). Amsterdam: IBFD.

Eberhartinger, E., & Petutschnig, M. (2015). Neues von den Latenten Steuern. In Bertl, R., Eberhartinger, E., Egger, A., Riegler, C., Kalss, S., Lang, M., Nowotny, C., Schuch, J., Staringer, C. (Eds.), *Reform der Rechnungslegung in Österreich* (pp. 57–74). Vienna: Linde Verlag.

Contributions to Legal Commentaries

Eberhartinger, E., & Petutschnig, M. (2017). § 258 UGB: Steuerabgrenzung. In Bertl, R., Fröhlich, C., Mandl, D. (Eds.), *Handbuch Rechnungslegung – Band II : Konzernabschluss* (pp. 197–221). Vienna: LexisNexis.

Working Papers

Amberger, H., Eberhartinger, E., & Kasper, M. (2016). Tax-Rate Biases in Tax-Planning Decisions: Experimental Evidence. Available at SSRN: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2727680

Presentations

Presented at (including co-authors): European Accounting Association (2017), Wiener Bilanzrechtstage (2017), European Financial Reporting Conference Fribourg (2017), American Taxation Association Midyear Meeting (2016), Accounting and Finance Association of Australia and New Zealand Conference – Gold Coast (2016), Crawford School of Public Policy Seminar (Australian National University, 2016), Accounting Research Seminar (University of Technology Sydney, 2016), Research Seminar (University of Ulm, 2016), International Conference on Tax Administration Sydney (2016), Research Seminar (University of Wellington, 2016), Jill McKinnon Seminar (Macquarie University Sydney, 2016), Oxford Centre for Business Taxation Doctoral Meeting (2015), British Accounting and Finance Association Doctoral Colloquium Edinburgh (2015), 5th Workshop on Current Research in Taxation Prague (2015), American Taxation Association Midyear Meeting (2015), 17th annual Conference on European Integration Swedish Network for European Studies in Economics and Business (2015), Wiener Bilanzrechtstage (2015), Third Annual TARC Workshop (2015), 24th Annual Tax Research Network Conference (2015), National Tax Association's 108th Annual Conference on Taxation (2015).

ASST.PROF. DR. MATTHIAS PETUTSCHNIG

RESEARCH FOCUS

In his current research projects Dr. Petutschnig focuses on consolidated taxation regimes, the OECD BEPS Action Plan, and capital gains taxation, among other topics.

Corporate Groups

Current research regarding the taxation of corporate groups extensively covers the OECD BEPS Action Plan and its ramifications (see Eberhartinger & Petutschnig (2017), The Dissenting Opinion of BRICS Practitioners on the BEPS Agenda, Australian Tax Forum 32(1), 1-57; Baik & Petutschnig (2017), Objective or Subjective: Anti-Treaty Shopping Policy in Select Asian Jurisdictions in the Post-BEPS World, Singapore Management University – Center for Excellence in Taxation – Working Paper). Additionally, the research focuses on respective current initiatives of the EU Commission (Anti-Tax-Avoidance Directive and CCCTB Directive).

Real Estate Capital Gains Tax

The project analyzes both short- and long-term effects on the real estate markets of the introduction of a comprehensive real estate capital gains tax in Austria in 2012. The empirical analysis of real estate transactions shows a significant increase in transaction activity during the announcement phase of the tax reform and a significant increase in the average price level after the introduction of the new tax. Some results have already been published (see Hörmanseder & Petutschnig (2016), Eine empirische Analyse der Auswirkung von Ertragsteuern auf dem österreichischen Immobilienmarkt, Betriebswirtschaftliche Forschung und Praxis 68(3), 270-290); a further paper will be published in 2017.

Investment Allowances

The project (carried out together with Asst.Prof. Dr. Silke Rüniger – University of Graz) focuses on the effectiveness of allowances and premiums for investment activity and allowances for equity. It empirically analyzes the effectiveness of tax measures aimed at increasing investment activity and equity increases (such as allowances for retained earnings, investment credits). Since the EU Commission has included an allowance for equity increases in its recent CCCTB draft directive, this research has gained particular relevance. Some results have already been published (see Petutschnig & Rüniger (2016), Die Wirkung von steuerlichen Maßnahmen zur Förderung von Eigenkapital – Eine Analyse am Beispiel Österreich, Betriebswirtschaftliche Forschung und Praxis 68 (4), 359-378.); a further paper will be published in 2017.

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Eberhartinger, E., & Petutschnig, M. (2017). The Dissenting Opinion of BRICS Practitioners on the BEPS Agenda. Australian Tax Forum, 32(1), 1–57.

Brightwell, M., & Petutschnig, M. (2016). Das österreichische VPDG - Ein kritischer Blick auf die Umsetzung des OECD BEPS-Aktionspunkts 13. Österreichische Steuerzeitung (ÖStZ), 69(21), 607-615.

Knesl, J., & Petutschnig, M. (2016). Der tschechische Trust im österreichischen Ertrag-Steuerrecht. *Steuer und Wirtschaft International (SWI)*, (8), 416–425.

Luka, K., & Petutschnig, M. (2016). Die EU-Kommission im Kampf gegen BEPS – Das EU-Maßnahmenpaket zur Bekämpfung von Steuervermeidung. *Österreichische Steuerzeitung (ÖStZ)*, 69(13), 358–368.

Petutschnig, M., & Rünger, S. (2016). Die Wirkung von steuerlichen Maßnahmen zur Förderung von Eigenkapital – Eine Analyse am Beispiel Österreich. *BFuP – Betriebswirtschaftliche Forschung und Praxis*, 68(4), 359–378.

Mittelbach-Hörmanseder, S., & Petutschnig, M. (2016). Eine empirische Analyse der Auswirkung von Ertragsteuern auf dem österreichischen Immobilienmarkt. *BFuP – Betriebswirtschaftliche Forschung und Praxis*, 68(3), 270–290.

Leyrer, P., & Petutschnig, M. (2016). „Brexit“ und die möglichen Auswirkungen auf das österreichische Steuerrecht. *Österreichische Steuerzeitung (ÖStZ)*, 69(23), 653–659.

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Working Papers

Mittelbach-Hörmanseder, S., & Petutschnig, M. (2016). An Empirical Analysis Real Estate Capital Gains Taxation.

Presentations

Presented at (including co-authors): Austrian Economic Association – Annual Meeting (2017), European Accounting Association – Annual Congress (2017), Austrian Economic Association – Annual Meeting (2017), VHB Jahrestagung (2017), VHB – Kommission Steuerlehre-Frühjahrstagung (2016), Tax Research Network 25th Annual Conference (2016), VHB Frühjahrstagung der Kommission Betriebswirtschaftliche Steuerlehre (2016), SASE Annual Conference (2016), European Accounting Association – Annual Congress (2016), American Taxation Association Midyear Meeting (2016), 5th Workshop on Current Research in Taxation Prague (2015), 8th Annual Congress of the European Accounting Association (2015), Third Annual TARC Workshop (2015), 24th Annual Tax Research Network Conference (2015)

DR. HARALD AMBERGER
RESEARCH FOCUS

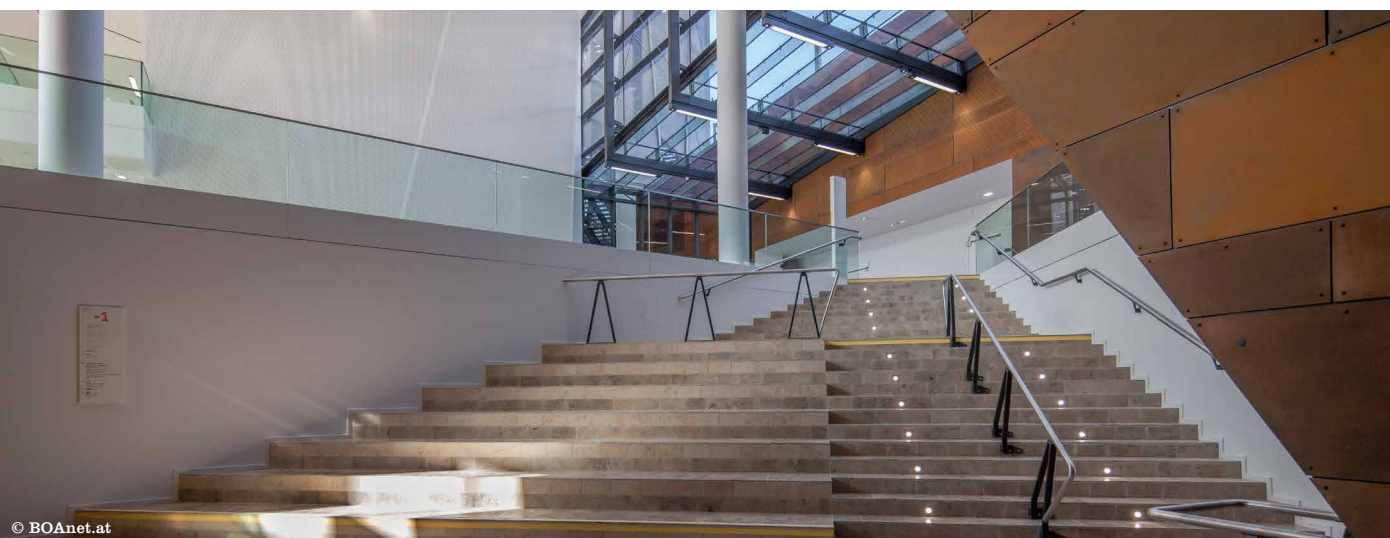
The cumulative dissertation project of Harald Amberger examines the effect of taxes on real corporate decisions. In three essays, he examines the following research questions.

**Paper 1: Tax-Rate Biases in Tax-Planning Decisions:
Experimental Evidence**

Contrary to standard economic theory, recent empirical findings suggest that firms do not always engage in economically optimal tax planning. Amberger conducts a laboratory experiment and found robust evidence that decision biases offer a behavioral explanation for sub-optimal tax planning. When facing time pressure in an intra-group cross-border financing decision, subjects apply heuristics based on the salience of statutory tax rates. This stirs decision-makers to underestimate the effects of tax-base changes and causes economically suboptimal decisions. Amberger found that tax-planning behavior is largely unaffected by subjects' work experience or education in accounting, taxation, and/or finance. However, he observed an overconfidence bias in subjects with work experience. In line with the theory of rational inattention, an increasing tax-burden difference between two tax-planning strategies weakly mitigates the use of heuristics. Taken together, his findings suggest that tax-information salience drives tax-planning decisions. This effect might cause decision biases and contribute to the undersheltering puzzle.

**Paper 2: International Taxation and the Role of
Organizational Form Choices of Multinationals**

Amberger examines if, when, and to what extent international taxation affects group structures of multinationals through the channel of organizational form choices. Analyzing micro-level data on inbound foreign direct investment relations in Germany, he found that multinationals are tax-sensitive in organizational form choices. He documented that a one standard deviation increase in the tax burden difference between a corporate (i.e. subsidiary) and a non-corporate organizational form (i.e. flow-through) is associated with a 3.57 percentage points higher probability of establishing a flow-through. This effect, which predominantly results from differences in repatriation taxes between organizational forms, is economically meaningful and comparable to the effects of non-tax determinants. In cross-sectional tests, he found that income-shifting opportunities, limited liability, group structure adjustment costs, and host-country experience moderate the tax-sensitivity. Taken together, his findings suggest that international taxation has far-reaching implications for group structures of multinationals.



Paper 3: Tax Uncertainty and Dividend Payouts

He examined whether and to what extent tax risk affects a firm's decision to distribute dividends, as well as the amount of dividend payouts. Tax risk increases cash-flow uncertainty and impairs the persistence and predictability of after-tax cash flow available for distribution. Based on this argument, he hypothesized and found that firms with greater tax risk exhibit a lower probability of dividend payouts. This effect of tax risk is weaker for firms that distribute dividends based on agency motives and for firms with a lower likelihood of unexpected tax payments. Moreover, he found a negative effect of tax risk on the amount of dividend payouts which is moderated by the costs of dividend reductions. The effect of tax risk is economically meaningful where a one standard deviation higher tax risk is associated with a 3.6% lower probability and a 6.8% lower amount of dividend payouts. Overall, his findings provide evidence for a real effect of tax avoidance and contribute to the understanding of interactions between risky tax avoidance and a firm's financial ecosystem.

PUBLICATIONS AND PRESENTATIONS

Working Papers

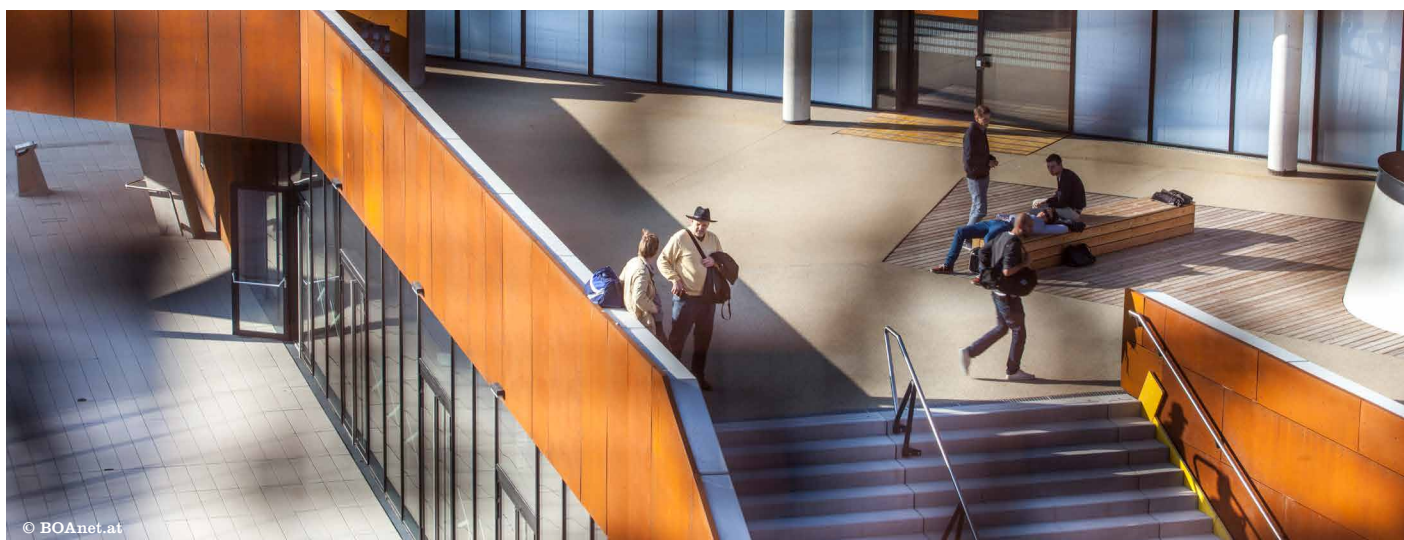
Amberger, H. (2017). Tax Uncertainty and Dividend Payouts. Available at SSRN: <http://ssrn.com/abstract=2945877>

Amberger, H., & Kohlhase, S. (2017). International Taxation and the Role of Organizational Form Choices for Group Structures of Multinationals. Available at SSRN: <http://ssrn.com/abstract=2929347>

Amberger, H., Eberhartinger, E., & Kasper, M. (2016). Tax-Rate Biases in Tax-Planning Decisions: Experimental Evidence. Available at SSRN: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2727680

Presentations

Presented at: European Accounting Association – Annual Congress (2017), American Taxation Association Mid-year Meeting (2017), 3rd Doctoral Research Seminar – WU Vienna (2016), 6th Workshop on Current Research in Taxation (2016), American Taxation Association Midyear Meeting (2016), Brown Bag Seminar at the University of Iowa (2016), National Tax Association's 108th Annual Conference on Taxation (2015), Oxford Centre for Business Taxation Doctoral Meeting (2015), British Accounting and Finance Association Doctoral Colloquium (2015), 5th Workshop on Current Research in Taxation Prague (2015), 2nd Doctoral Research Seminar – WU Vienna (2015).



TOBIAS BORNEMANN, MSC, LL.M.
RESEARCH FOCUS

Tobias Bornemann theoretically and empirically analyzes the effect of taxation on research and development (R&D) investments of multinational enterprises. In particular, Tobias is interested in the interactions of transfer pricing regulations and R&D investments, as well as the effectiveness of tax incentives for R&D investments. An analytical project deals with the impact of licensing and cost sharing agreements within multinational firms on their R&D investments. Accordingly, especially cost sharing agreements offer large profit shifting opportunities, but also spread risks of R&D investments across several agents within the firm. A second project, carried out together with Benjamin Oßwald, analyzed empirically the effectiveness of IP boxes (beneficial tax rates for IP income) in light of MNEs' opportunities to avoid taxes. Accordingly, IP boxes provide windfall gains especially for domestic firms, as well as multinationals without income shifting opportunities, without significantly boosting the patent output of these firms. Another project, carried out together with Prof. Eva Eberhartinger, analyzed the current EU initiative for public country-by-country reporting to provide the public with significant information on the tax affairs of MNEs.

PUBLICATIONS AND PRESENTATIONS
Presentations

Presented at: European Accounting Association – Annual Congress (2017), American Taxation Association Mid-year Meeting (2017), 3rd Doctoral Research Seminar – WU Vienna (2016), 108th Annual Conference on Taxation (2015), arqus Annual Conference (2015), European Accounting Association – Annual Congress (2015), 2nd Doctoral Research Seminar – WU Vienna (2015)

MICHAEL BRIGHTWELL, MSC (WU)
RESEARCH FOCUS

Mr. Brightwell's research focuses on Austrian and international corporate taxation, as well as on the taxation of real estate. As such, he critically analyzed (together with Asst.Prof. Dr. Matthias Petutschnig) the Austrian implementation of BEPS Action 13 (Transfer Pricing Documentation and Country-by-Country Reporting) in the form of the Verrechnungspreisdokumentationsgesetz (see Brightwell & Petutschnig, *Das österreichische VPDG – Ein kritischer Blick auf die Umsetzung des OECD BEPS-Aktionspunkts 13*; *Österreichische Steuerzeitung (ÖStZ)* 21/2016, 607–615). As a result of his second focus, he analyzed definition conflicts in the Austrian real estate profit tax (see Brightwell, *Der Begriff „steuerverfangen“ und die Abgrenzung von Alt- und Neuvermögen in der Immobilienertragsteuer*; *Steuer- und Wirtschaftskartei (SWK)* 10/2017, 546–551). Furthermore, Mr. Brightwell focuses on questions concerning the taxation of start-ups in the European Union – a topic that will also be the topic of his doctoral thesis.

PUBLICATIONS AND PRESENTATIONS
Contributions to Journals

Brightwell, M., & Petutschnig, M. (2016). *Das österreichische VPDG - Ein kritischer Blick auf die Umsetzung des OECD BEPS-Aktionspunkts 13.* *Österreichische Steuerzeitung (ÖStZ)*, 69(21), 607–615.

Brightwell, M. (2017). *Der Begriff „steuerverfangen“ und die Abgrenzung von Alt- und Neuvermögen in der Immobilienertragsteuer.* *Steuer- und Wirtschaftskartei (SWK)*, (10), 546–551.

NADIA GENEST, LL.M. **RESEARCH FOCUS**

While representing the most predominant organizational form around the world, family firms received growing attention from academic research only during the past 20 years. Nonetheless, only a few studies have investigated the influence of taxation on decision-making in the context of family firms. Consequently, Ms. Genest's dissertation analyzes the relationship between tax rules and decision-making in the context of family businesses. More specifically, considering succession issues raised by an aging population, it investigates the timing effect of tax rules on a firm's transfer from one generation to the next through an experimental design. Moreover, in light of discussions about tax avoidance, her dissertation dissects how preferences of principals for different dimensions of the family firm's socioemotional wealth affect the firm's tax aggressiveness.

JAN KNESL, MSC (WU) **RESEARCH FOCUS**

In light of the recent tax base erosion and profit shifting (BEPS) issues, the OECD has developed a best-practice approach to tackling international tax avoidance strategies involving interest and other financial payments. In the best-practice approach, particular attention has been dedicated to financial institutions which, considering their specific features, might be excepted from the general scope of this approach. Nonetheless, based on the premise of base erosion and profit shifting, financial institutions should be subject to targeted rules. The thesis by Mr. Knesl identifies the risks posed by financial institutions and analyzes the application of the proposed rules to banks.

PUBLICATIONS AND PRESENTATIONS **Contributions to Journals**

Knesl, J., & Luka, K. (2016). (Bilanz-)Steuerliche Behandlung der Vergütungspolitik und -praxis gem § 11 AIFMG. Österreichische Steuerzeitung (ÖStZ), 69(17), 473–478.
Knesl, J., & Petutschnig, M. (2016). Der tschechische Trust im österreichischen Ertrag-Steuerrecht. Steuer und Wirtschaft International (SWI), (8), 416–425.

PATRICK LEYRER, MSC (WU) **RESEARCH FOCUS**

The research activities of Patrick Leyrer concentrate on the national tax treatments of a usufruct. There are many open questions concerning this topic. Especially in the field of allocation to the economic ownership of a usufruct, for example, there are still outstanding issues. Due to insufficient adequate, statutory regulations, it is unavoidable to refer to the current literature, as well as expert opinions. This leads to an enormous legal insecurity. The consequence could be that the fact influences or even inhibits potential business decisions.

Therefore, the objective of his doctoral thesis is to systematically process the tax treatment of a usufruct. Existing loopholes will be noted and possible solutions will be found. Furthermore, these loopholes should be demonstrated through an analysis of real issues; another point is to analyze and compare all of the different variants of a usufruct.

PUBLICATIONS AND PRESENTATIONS **Contributions to Journals**

Leyrer, P. (in press). Privater Grundstücksverkauf und Werbungskostenabzug. Steuer- und Wirtschaftskartei (SWK).
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Leyrer, P. (in press). Wirtschaftliches Eigentum bei Fruchtgenussvereinbarungen an Liegenschaften. taxlex.
Leyrer, P., & Frank, S. (2016). Ein neues Berichtselement Der Bericht über Zahlungen an staatliche Stellen. RWZ – Zeitschrift für Recht und Rechnungswesen, 12(89), 383–390.
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KATHARINA LUKA, MSC (WU)

RESEARCH FOCUS

The current research of Katharina Luka focus on the impact of BEPS Action 4 on the taxation of leasing, with the aim of identifying a tax scheme that would reduce the tax burden for companies while also taking into account the prevention of base erosion and profit shifting. Although leasing is one of the most substantial alternatives to debt financing, a legal definition is still lacking in Austria. However, especially the differentiation between operating leasing and finance leasing is essential for the allocation of the leased asset, to either the lessor or the lessee. This lack of legal certainty is also a problematic issue for cross-border leasing where the national and international law may provide divergent definitions of operating leasing and finance leasing. Regarding financing and taxation, cross-border leasing may therefore result in advantages and/or drawbacks for one and the same situation. As a consequence, the OECD issued an Action Plan to address BEPS and, specifically with BEPS Action 4, to limit base erosion involving interest deductions and other financial payments, including the financing costs of finance leasing.

PUBLICATIONS AND PRESENTATIONS

Contributions to Journals

Luka, K., & Jasenek, R. (2016). Aktuelle Themen der Zurechnung beim Immobilienleasing. *taxlex*, (7–8), 223–228.

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DR. STEPHANIE NOVOSEL

RESEARCH FOCUS

In her dissertation project, Dr. Novosel deals with the taxation of partnerships in Austria and Germany, as well as the international aspects of partnership taxation. As part of the business formation, entrepreneurs must decide on the legal form through which their business should be carried out. This can be a very complex question, as many criteria must be considered. This research project focuses on establishing a model that allows the consideration of taxation standards in an international context. The project thus deals with the question as to the optimal legal form of a German partnership for its operating business in Austria, and provides a comprehensive model that allows recommendations as to the optimal legal form (as regards the overall taxation) to be offered in a specific case.

In her further research work, she focuses on current issues in connection with business taxation and the effects of changes in tax law on the taxation of businesses.

PUBLICATIONS AND PRESENTATIONS

Contributions to Journals

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Novosel, S., & Patloch, A. (2015). Bilanzielle Unklarheiten im Zusammenhang mit dem Anlagen-Contracting in Österreich. *Steuer- und Wirtschaftskartei (SWK)*, 90(18), 824–831.

Novosel, S., & Patloch, A. (2015). Nachträgliche Berücksichtigung des investitionsbedingten Gewinnfreibetrags gemäß § 10 EStG. *taxlex*, (6), 187–190.

Novosel, S., Novosel, Y., & Patloch, A. (2015). Ist die Immobilienertragsbesteuerung von Altvermögen verfassungskonform Gesetz geworden? *Steuer- und Wirtschaftskartei (SWK)*, (13), 629–632.

Novosel, S. (2015). Wirtschaftliches Eigentum und Absetzung für Abnutzung bei Fruchtgenussrechten an übertragenen Immobilien – Vorbehaltsfruchtgenuss. *Österreichische Steuerzeitung (ÖStZ)*, (1–2), 13–19.

Contributions to Anthologies

Novosel, S., & Rindler, R. (2016). Die GmbH & Co KG und ihre Gesellschafter im Ertragsteuerrecht. In Arnold, N. (Ed.), *GmbH & Co KG - Gedenkschrift für Wolf-Dieter Arnold*, (pp. 263–311).

Contributions to Legal Commentaries

Bartos, P., & Novosel, S. (in press). Kommentierung Vorräte und Forderungen. In Fritz-Schmied, G., & Kanduth-Kristen, S. (Eds.), *Bilanzpostenkommentar (BilPoKom)*.

DIPL.-KFM. BENJAMIN OßWALD

RESEARCH FOCUS

Mr. Oßwald's dissertation project investigates the influence of research and development (R&D) tax incentives on the activities of companies. It examines the interaction of the characteristics of companies and different regimes of R&D tax incentives. Another part of his dissertation investigates the effects of changes in tax rates and loss carryforward/back rules on risk-taking of firms in a cross-border context.

PUBLICATIONS AND PRESENTATIONS

Contributions to Journals

Oßwald, B. (2016). Die Entwicklung von Tax Inversions und deren Implikationen für US-amerikanische und europäische Unternehmen. *Steuer und Wirtschaft International (SWI)*, 26(2), 90–99.

Oßwald, B., & Sureth-Sloane, C. (2015). Entscheidungskalküle US-amerikanischer Unternehmen bei Tax Inversions. *Steuer und Wirtschaft International (SWI)*, 25(10), 478–486.

Contributions to Legal Commentaries

Mittelbach-Hörmanseder, S., & Oßwald, B. (2017). § 267b UGB: Konsolidierter Bericht über Zahlungen an staatliche Stellen. In Bertl, R., Fröhlich, C., & Mandl, D. (Eds.), *Handbuch Rechnungslegung - Band II : Konzernabschluss* (pp. 487–493). Vienna: LexisNexis.

Presentations

Presented at: American Taxation Association Midyear Meeting (2017), University of Wisconsin-Madison (2017), WHU Brown Bag Seminar (2016), 3rd Doctoral Research Seminar – WU Vienna (2016), arqus Conference (2016), arqus Conference (2015), 2nd Doctoral Research Seminar – WU Vienna (2015).

DR. ALEXANDRA PATLOCH-KOFLER

RESEARCH FOCUS

In Austria, a new provision regarding the deductibility of remuneration was implemented in 2016. According to the new policy, the part of remuneration, which exceeds 500.000 euro per person, is not tax deductible for corporations anymore. A similar provision has existed in the United States since 1994. Various empirical studies could show that the US-provision was not very successful in order to influence management compensation in the desired direction. Due to significant differences in the absolute amount and the composition of executive remuneration, the results of the US-studies are not valid for German-speaking regions. Therefore, as part of the PhD thesis, investigations will be carried out in order to give insights into the effects of taxes on the remuneration of Austrian executives.

PUBLICATIONS AND PRESENTATIONS

Contributions to Journals

Patloch, A. (in press). Wirtschaftspolitische Maßnahmen zur Beeinflussung von Managergehältern. *Zeitschrift für Wirtschaftspolitik*.

Patloch, A., & Petrikovics, F. (2017). Der Teiler von Urlaubsrückstellungen im EStG und UGB. *Steuer- und Wirtschaftskartei (SWK)*, 92(7), 430–434.

Patloch, A., & Petrikovics, F. (2017). Vorbehaltsfruchtgenuss an Grundstücken – Irrelevanz der Trennung von Frucht und Stamm in der Umsatzsteuer. *Recht der Wirtschaft*, 35(1), 61–64.

Novosel, S., & Patloch, A. (2016). Die entgeltliche Ablöse eines Veräußerungs- und Belastungsverbots. *Steuer- und Wirtschaftskartei (SWK)*, (11), 590–598.

Patloch, A., & Petrikovics, F. (2016). Immobilienvermietung durch die Kapitalgesellschaft an den Gesellschafter. *Steuer- und Wirtschaftskartei (SWK)*, (27), 1175–1180.

Patloch, A., & Petrikovics, F. (2016). Immobilienvermietungen von Gesellschaften an ihre Gesellschafter im Ertragsteuerrecht. *Steuer- und Wirtschaftskartei (SWK)*, (32), 1350–1356.

Cupal, A., Patloch, A., & Petrikovics, F. (2016). Unbestimmte Vertragsdauer bei Vereinbarung aller denkmöglichen Kündigungsgründe gem § 30 Abs 2 MRG. *immolex*, (7–8), 221–224.

Novosel, S., Novosel, Y., Patloch, A., & Patloch, T. (2015). Die Firmenwertabschreibung in der österreichischen Unternehmensgruppe im Lichte des Unionsrechts. *Österreichische Steuerzeitung (ÖStZ)*, 68(21), 627–632.

Novosel, S., & Patloch, A. (2015). Bilanzielle Unklarheiten im Zusammenhang mit dem Anlagen-Contracting in Österreich. *Steuer- und Wirtschaftskartei (SWK)*, 90(18), 824–831.

Novosel, S., & Patloch, A. (2015). Nachträgliche Berücksichtigung des investitionsbedingten Gewinnfreibetrags gemäß § 10 EStG, *taxlex*, (6), 187–190.

Novosel, S., Novosel, Y., & Patloch, A. (2015). Ist die Immobilienertragsbesteuerung von Altvermögen verfassungskonform Gesetz geworden? *Steuer- und Wirtschaftskartei (SWK)*, (13), 629–632.

Patloch, A. (2015). Teilweises steuerliches Abzugsverbot von Gehältern - eine wirkungsvolle Maßnahme zur Reduktion bzw Neuzusammensetzung von Vergütungen? *RWZ – Zeitschrift für Recht und Rechnungswesen*, (5), 129–134.

Contributions to Anthologies

Eberhartinger, E., & Patloch, A. (2015). Definition of Income Taxes. In Bakker, A., van den Berg, T., & Janssen, B. (Eds.), *Tax Accounting: Unravelling the Mystery of Income Taxes* (pp. 47–62). Amsterdam: IBFD.

Working Papers

Mittelbach-Hörmanseder, S., & Patloch, A. (2016). Executive Compensation in Austria.

DAVID SAMUEL, MSC (WU)**RESEARCH FOCUS**

Mr. Samuel's research focus covers issues in finance, accounting, and taxation. At the moment, he is working on two of his dissertation papers which each analyze the real effects of taxes in an empirical-archival setting. The first paper investigates the effects of taxes on financing decisions, while the second paper measures the investment effect of taxes in an international context. Moreover, he is interested in financial transaction taxes and how taxes affect entrepreneurship.

PUBLICATIONS AND PRESENTATIONS**Contributions to Journals**

Samuel, D. (in press). Wesentliche Neuerungen für Unternehmen durch die Erbschaftsteuerreform 2016 in Deutschland. *Steuer und Wirtschaft International (SWI)*.

Presentations

Presented at: Paper Discussion at 3rd Doctoral Research Seminar – WU Vienna (2016)

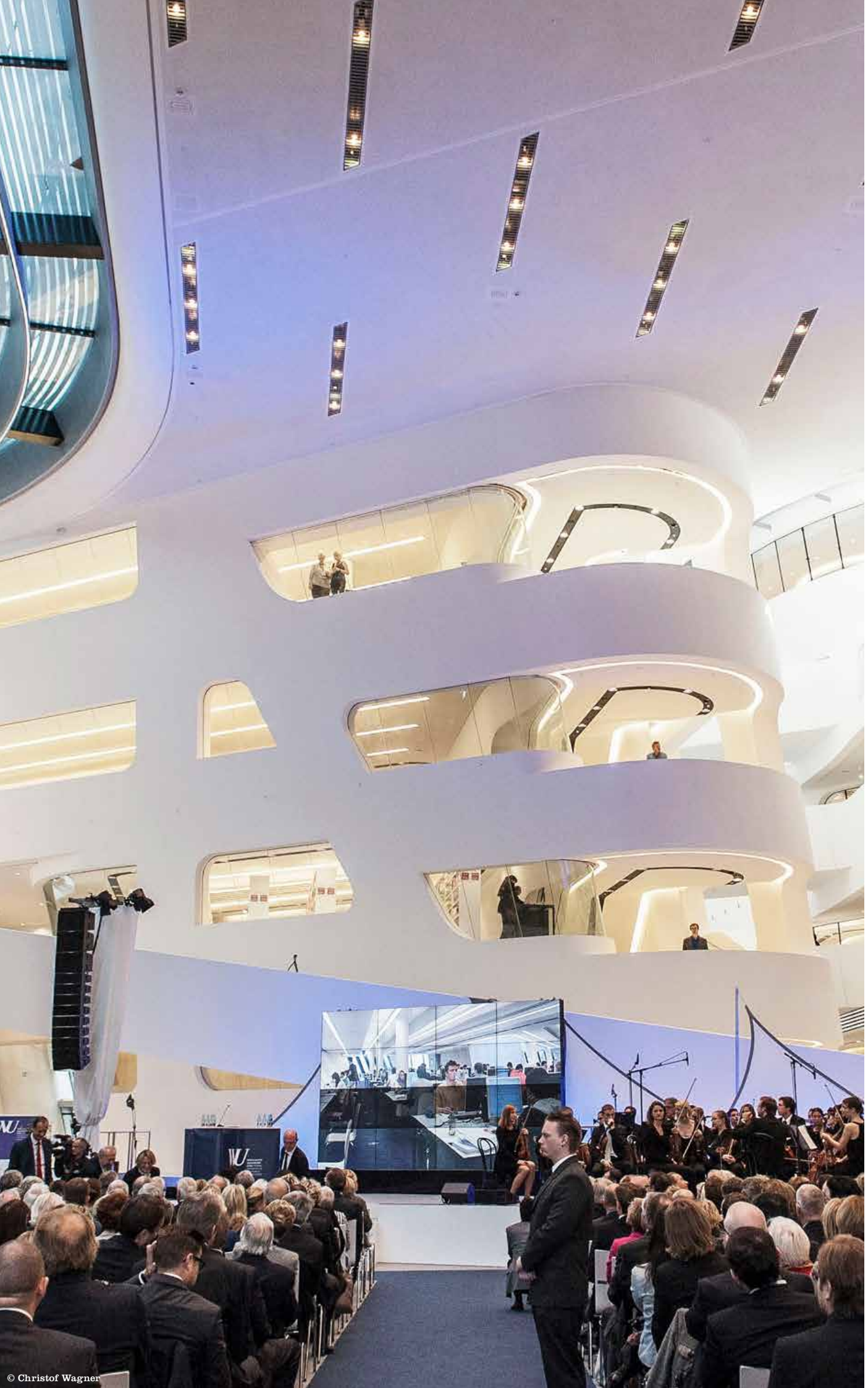
DR. STEFAN WEINHANDL**RESEARCH FOCUS**

The Federal Tax Code (Bundesabgabenordnung, BAO) contains all general statutory provisions of Austrian tax and procedural law. In addition to numerous definitions of tax-relevant terms, this source of law also covers all rules regarding legal protection. The latter is of particular importance for every taxpayer, as its rules represent the only possibility to challenge tax assessment notices. Therefore, the question arises as to how effective those legal protection rules are, and whether procedural provisions have an influence on the outcome of decisions concerning substantive tax law. Empirical legal analyses of the decisions of the UFS (Independent Finance Senate) and BFG (Federal Finance Court), respectively, are conducted in order to provide quantitative and statistical answers to this question. Furthermore, they shed light on other factors influencing those lawsuits, as well.

PUBLICATIONS AND PRESENTATIONS**Contributions to Journals**

Novosel, S., & Weinhandl, S. (2016). Die Zuschreibungsrücklage iSd § 124b Z 270 EStG – Analyse der Auflösungstatbestände (Teil 2), *Österreichische Steuerzeitung (ÖStZ)*, 69(22), 630–633.

Novosel, S., & Weinhandl, S. (2016). Die Zuschreibungsrücklage iSd § 124b Z 270 EStG – Analyse der Auflösungstatbestände (Teil 1), *Österreichische Steuerzeitung (ÖStZ)*, 69(21), 597–602.



Events

We regularly host (international) events and researchers at WU

DOCTORAL RESEARCH SEMINAR

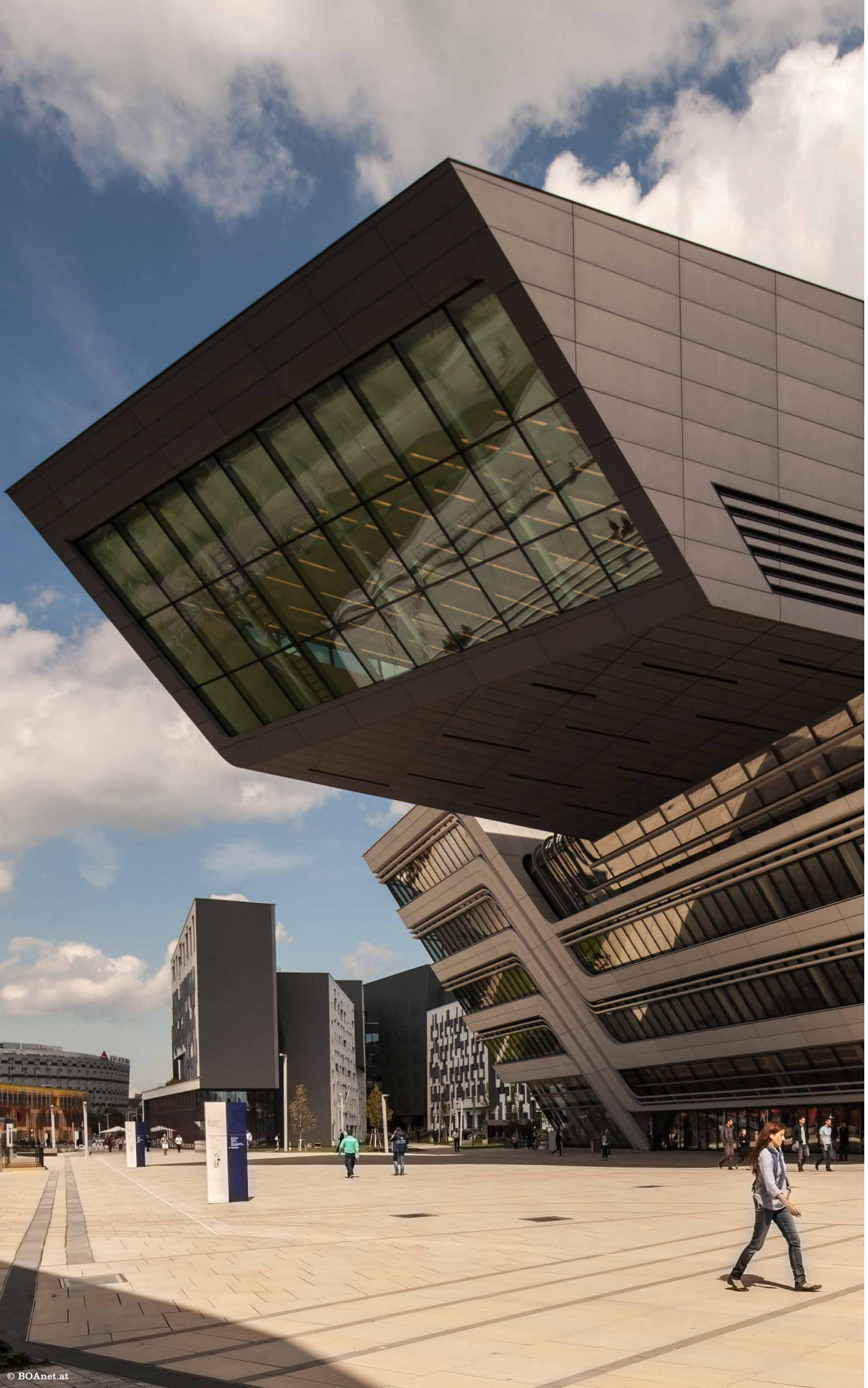
In October 2016 the Third WU doctoral research seminar was held, at which PhD students and professors from European universities were invited to the WU campus. For two days, 22 young scholars from various universities presented and discussed their research projects. In July 2017, the "7th Conference on Current Research in Taxation" will be held at WU. Together with the European Institute for Advanced Studies in Management (EIASM) and the University of Münster, our group organized this conference and will offer an additional workshop for PhD students.

WORKSHOPS

In the fall term 2016/2017, Prof. Scott Dyreng (Duke University, USA) offered a workshop at WU on current issues in tax accounting. In May 2017, Prof. Petro Lisowsky (University of Illinois at Urbana-Champaign, USA) held a workshop for PhD students, at which the current state of research on tax avoidance and other issues was discussed. Prof. Lisowsky is also one of the chairs of the PhD workshop offered after the Seventh Conference on Current Research in Taxation (see above). We were very pleased that Prof. Faff (University of Queensland, Australia) gave one of his Pitching Research workshops at WU in October 2016.

ACCOUNTING RESEARCH SEMINAR

Our institute regularly invites researchers from around the world to present their research at WU. Over the last two years, many distinguished researchers accepted our invitations and presented at WU. We were extremely pleased to host Ewald Aschauer (Johannes Kepler University, Linz), Robert Bushman (University of North Carolina at Chapel Hill), Florian Hoos (HEC Paris), Henriette Houben (HU Berlin), Katrin Hummel (University of Zurich), Martin Jacob (WHU Vallendar, Germany), Sandra Kronenberger (University of Hannover), Eva Labro (University of North Carolina at Chapel Hill), Petro Lisowsky (University of Illinois at Urbana-Champaign), Nonna Martinov-Bennie (Macquarie University, Australia), Rainer Niemann (University of Graz), Per Olsson (ESMT Berlin), Georg Schneider (University of Graz), Mariano Scapin (University of Bristol), Ulrike Stefani (University of Konstanz), Caren Sureth-Sloane (University of Paderborn and WU), Robert Ullmann (University of Augsburg), and Alfred Wagenhofer (University of Graz).



Information and contact

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Bus: 82A, "Südportalstraße" stop