

Academic Report 2017–2018

Tax Management Group

Institute for Accounting & Auditing







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Introducing the Group

This is who we are

This report includes an overview of our group's activities in the 2017/18 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 (chaired by Prof. Dr. Zoltan Novotny-Farkas, beginning on September 1, 2018).

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. We would also like to congratulate Harald Amberger, who graduated with "sub auspiciis Praesidentis rei publicae" from his doctoral studies in February 2018, and Matthias Petutschnig, who finished his habilitation in June 2018.

Prof. Dr. Eva Eberhartinger

FACULTY (AS OF JUNE 2018)

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.



ASS.-PROF. DR. MATTHIAS PETUTSCHNIG

is an Assistant Professor at the Tax Management Group (since January 2013). Before 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, dealing with the allocation of tax liabilities among corporate group entities under the EU's Common Consolidated Corporate Tax Base proposal, was awarded by the Austrian Theodor Körner Fonds and the German Chamber of Tax Consultants in 2011. In his current research projects Dr. Petutschnig focuses on consolidated taxation regimes, the OECD BEPS Action Plan, Capital Gains Taxation, etc. He held visiting positions at the University of Leipzig, Singapore Management University and North Carolina State University.



HARALD AMBERGER, PH.D.

is since February 2018 a research assistant post doc and obtained his Doctoral Degree "sub auspiciis Praesidentis rei publicae" at WU graduating from the Doctoral Program in International Taxation (DIBT). He also holds a master's degree in finance and accounting from WU. His research interests lie in the effect of taxes on real corporate decisions (e.g., financing and investment decisions, organizational form choices, payout policy) and he applies empirical archival as well as experimental methods. He was a visiting researcher at the University of Iowa and is an ongoing guest researcher at the Deutsche Bundesbank. Before re-joining WU, he held a post doc position at the University of Graz.

**PAUL BREZINA, MSC (WU)**

is University Assistant, externally funded by ABG Wirtschaftsprüfungs & Steuerberatungs GmbH. He holds a master's degree in taxation and accounting from WU Wien. In April 2017, he was appointed as Austrian Tax Advisor. Currently, his research focuses on questions in connection with Cryptoeconomy and Blockchain-Technology.

**MICHAEL BRIGHTWELL, MSC (WU)**

is University Assistant, externally funded by Moore Stephens MSVIE connect GmbH Wirtschaftsprüfung Steuerberatung. 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 Austrian and international corporate taxation, with a special focus on start-up companies.

**STEFANIE CHROUSTOVSKY, LL.B. (WU)**

has been working as a student assistant in the Tax Management Group since November 2015. Her range of responsibilities include supportive and assistive work in teaching, research and administration. In addition, she contributes to the support of the "Accounting and Taxation" specialization offered to undergraduate students of the University. She successfully completed her bachelor's degree in business law at WU in 2017, and is currently in her master's degree in business law at WU. During her time with the Tax Management Group she concurrently completed internships at the OECD in Paris and at Deloitte in Vienna.

**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 (LL.M.) 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. Her research interests are in tax reporting in financial statements.



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 program Taxation and Accounting in January 2016. Since March 2016 he has been working as an university assistant, staff financed with third party funding from BDO, in the department for Auditing and business taxation. During his bachelor and master program he acted as aspirant to become a tax consultant. His dissertation concentrates on the taxation treatment of the usufruct.



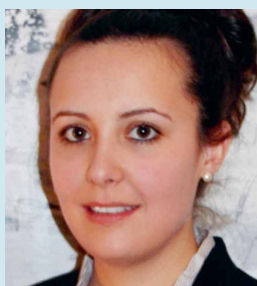
KATHARINA LUKA, MSC (WU)

is working as teaching and research associate (externally funded by Deloitte) at the Tax Management Group since September 2015 when she graduated from the Master's Program Business Finance and Accounting. In addition, she is tax advisor trainee at Deloitte. Her doctoral thesis deals with the impacts of the BEPS Action 4 on the tax treatment of leasing relationships aiming at the identification of a taxation scheme reducing the tax burden for companies but also considering the avoidance 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.



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.



KRISTIN RESENIQ, LL.B. (WU)

has been working as a student assistant since April 2018. Her range of responsibilities include supportive work in research and administration. She spent 2 years as a legal intern of the tax team at an international law firm. She will complete her master's degree in business law at WU in summer 2018 and hereafter she will start working as a university assistant.



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)

is interested in topics at the intersection of Accounting and Corporate Finance, with a special focus on the effects of taxation on (corporate) decision making. Moreover, he is interested in International Taxation and taxation of the financial sector. David holds a BSc in Business Administration from the University of Mannheim and an MSc in Strategy, Innovation, and Management Control from Vienna University of Economics and Business. Before starting his doctoral studies, David gained professional experience in the private (PwC and BMW) as well as in the public sector (UNIDO). During the 2018 spring semester, David visited the Department of Accountancy at the University of Illinois at Urbana-Champaign. He accepted a position (starting in fall 2018) at the University of Wisconsin-Madison.



RAFFAEL SPEITMANN, MSC (WU)

holds a BSc in Economics from the University of Munich, and a MSc from WU. He spent exchange semesters abroad at Charles-University Prague (2011) and ESSEC Business School Paris (2014). After graduation from WU, he worked for two years as an analyst in the financial industry. Since September 2017, he has been studying in the DIBT at WU and currently focuses on the effects of tax-related disclosure rules on the financial sector.



STB 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. Since 2017, he is a certified tax advisor.



YUCHEN WU, MSC

was born in Wuxi, Jiangsu, China. She holds an MSc in International Financial Management (University of Groningen), an MSc in Business and Economics (Uppsala University) and a Bachelor's in Accounting. After that, she worked at the South African Financial Intelligence Centre (FIC) and then on donor-funded projects to research illicit financial flows. Her research interest is mainly in how behaviors of tax authorities change behaviors of taxpayers. Since 2017, she is a student in the Doctoral Program in Business Taxation (DIBT) at WU.

GUEST FACULTY AND VISITING RESEARCHERS

Prof. Kevin Markle (University of Iowa, USA)	visited our group in November 2017 to offer a research seminar and presented his research at our Institute.
Prof. Leslie Robinson (Tuck School of Business, USA)	presented her research at our Institute and was a member of Dr. Bornemann's PhD defense committee.
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

Tobias Bornemann, Ph.D.	graduated from WU with a PhD in International Business Taxation and now works at the University of Paderborn.
Benjamin Oßwald	accepted a position at the University of Wisconsin-Madison.



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, Investment, Finance and Taxes, the seminar in Applied Taxation, 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 Business Taxation, 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 2017 and 2018:

Belabrovik, A.: Zinsabzugsbeschränkungen im Lichte des Leistungsfähigkeitsprinzips (2017).

Egger, T.: Ermittlung von Verrechnungspreisen bei immateriellen Wirtschaftsgütern im internationalen Kontext (2017).

Gloser, D.: Steuerplanung multinationaler Unternehmen unter Supply Chain Management Gesichtspunkten (2017).

Hackl, C.: Einkommensteuerrechtliche Ausnahmen vom objektiven Nettoprinzip: Die Verfassungsmäßigkeit der §§ 20 Abs 1 Z 7, 20 Abs 1 Z 8 und 27a Abs 4 Z 2 (2017).

Hafner, K.: Die Steueroptimale Gestaltung der Betriebsbeendigung (2017).

Hebenstreit, B.: Die Neuregelung der Wegzugsbesteuerung durch das AbgÄG 2015 – Darstellung des Systemwechsels und mögliche Fallstricke (2017).

Hinteregger, M.: Die österreichische Privatstiftung im internationalen Steuerrecht – gesehen aus der Perspektive ausländischer Stifter und Begünstigter (2018).

Kastl, K.: Diskontierung von langfristigen Rückstellungen im UGB und Ertragsteuerrecht (2017).

Kolenda, M.: Wie elastisch ist die Steuerbemessungsgrundlage? Methodische Herausforderungen bei der Schätzung der ETI (2017).

Koncz, G.: Inbound Foreign Direct Investment in Deutschland – ein steuerlicher Belastungsvergleich der Rechtsformwahl im Konzern anhand exemplarischer Herkunftsländer (2017).

Kremser, J.: Steuerquoten multinationaler Unternehmen – Einflussfaktoren und Beeinflussungsmöglichkeiten (2017).

Lebinger, U.: Dokumentationspflichten nach dem Verrechnungspreisdokumentationsgesetz (2017).

Manhardt, J.: Die Bedeutung von Konzernklauseln im nationalen und internationalen Steuerrecht (2017).

Mezgolits, C.: Werbe-, Repräsentations- und Sponsoraufwand im Steuerrecht (2017).

Reisinger, N.: Analysis of the UK tax regime upon retirement and inheritance for Family Business (2017).

Reiter, A.: Country-by-Country Reporting – Chancen und Risiken für multinationale Unternehmen (2017).

Rizzi, J.: Luxembourg Leaks – eine Analyse weitreichender Steuervermeidungspraktiken in der Europäischen Union (2017).

Schimek, M.: Die Besteuerung von Expatriates (2017).

Soecknick, A.: Effektive Steuersätze in den Einzelabschlüssen österreichischer Kapitalgesellschaften – eine empirische Analyse (2017).

Türkan, A.: Der Unternehmensübergang und die Unternehmensbeendigung von Todes wegen aus ertragsteuerrechtlicher Sicht (2017).

Yang, Q.: Latente Steuern nach dem RÄG 2014 (2017).

Zehetmayer, S.: Start-Ups and Taxes: How do governments use tax policies to foster entrepreneurship (2017).

Zhang, T.: Der Nexus-Begriff im US-amerikanischen Steuerrecht, dem CCCTB-Entwurf und in Action 5 des BEPS-Actionplans (2017).

Zillinger, J.: Aktuelle Entwicklung in der Konzernfinanzierung unter Berücksichtigung von BEPS und der EU-Richtlinie zur Bekämpfung von Steuervermeidungspraktiken (2017).

Zittmayr, A.: Funktion und Zweifelsfragen zu den neuen Erwerbsvorgängen iSd § 1 GrEStG (2017).

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:

- › Kick-off session for the Master's Program in Taxes and Accounting, sponsored by **KPMG**

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.

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 2017 through 2018, the following dissertations were successfully completed under her supervision or co-supervision:

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

Bornemann, T.: Give and Take – The Effect of Taxation on Firms' Innovation (2018)

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)



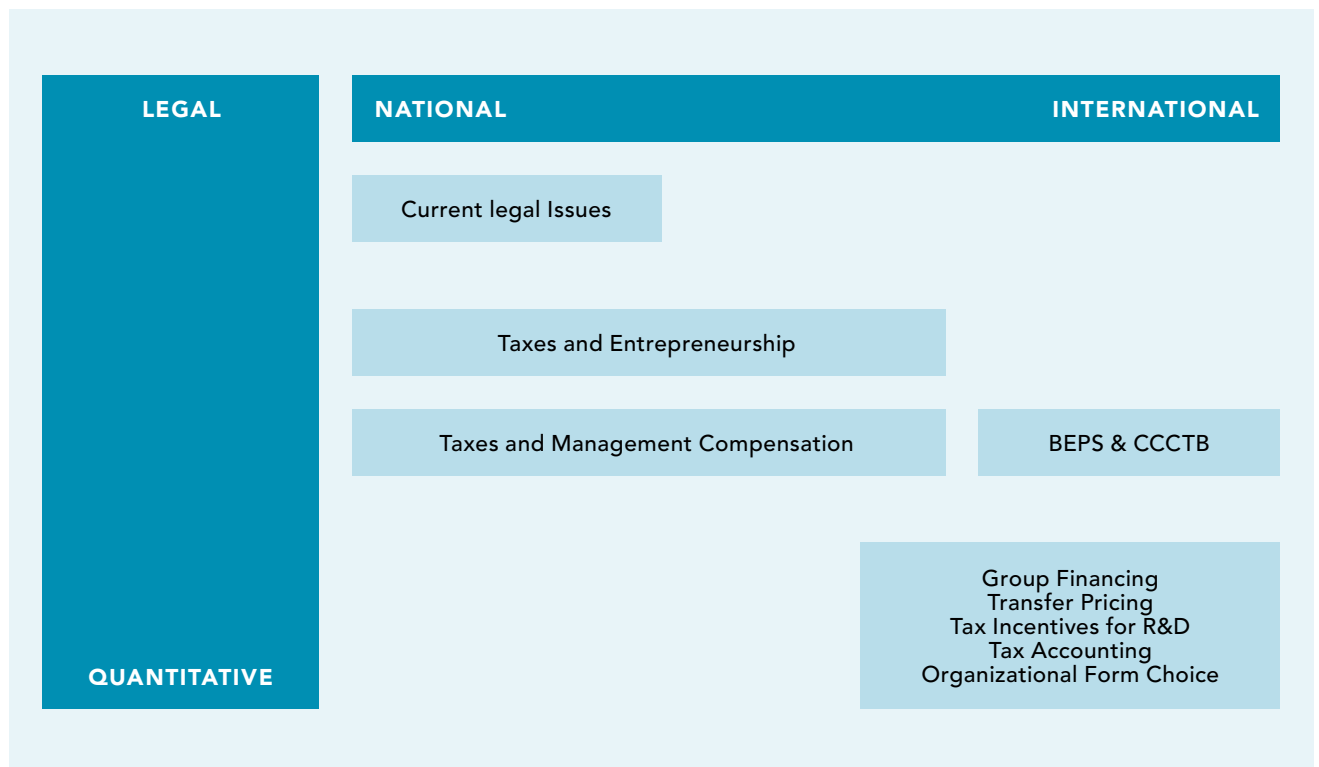
Research

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 Wirtschaftstreuhand). In 2018, the conference focused on value measures. 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 **ABG Wirtschaftsprüfungs & Steuerberatungs GmbH**, **BDO**, **Deloitte**, **KPMG**, **Moore Stephens MSVIE connect**, **TPA** 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., & Luka, K. (2018). Analyse des OePR Enforcement. *Zeitschrift für Recht und Rechnungswesen*, 5, 159–168.

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

Eberhartinger, E., & Bornemann, T. (2017). Die Initiative der EU um öffentlichen Country-by-Country Reporting. *RWZ – Zeitschrift für Recht und Rechnungswesen*, 27(10), 319–325.

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*, 13(2), 51–57.

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.) (2017). Hybrid-Finanzierung in Bilanz- und Steuerrecht. *Wiener Bilanzrechtstage 2017*. Vienna: Linde Verlag.

Book Chapters

Eberhartinger, E., Knesl, J. (2017). Hybride Finanzierung aus Sicht des Emittenten im UGB-Jahresabschluss. In: *Hybrid-Finanzierung in Bilanz- und Steuerrecht*, Eds. Bertl/Eberhartinger/Egger/Kalss/Lang/Nowotny/Riegler/Schuch/Staringer, 31–58. Vienna: Linde Verlag.

Contributions to Legal Commentaries

Brightwell, M., & Eberhartinger, E. (2018). Inhalt der Bilanz (§ 198 Abs 1–4). In Bertl, R., Fröhlich Ch., Mandl, D. (Eds.), *Handbuch Rechnungslegung – Band I: Einzelabschluss*. Vienna: Lexis Nexis.

Eberhartinger, E., & Weinhandl, St. (2018). Rückstellungen (§ 198 Abs 8). In Bertl, R., Fröhlich Ch., Mandl, D. (Eds.), *Handbuch Rechnungslegung – Band I: Einzelabschluss*. Vienna: Lexis Nexis.

Eberhartinger, E., & Petutschnig, M. (2018). Latente Steuern (§ 198 Abs 9–10). In Bertl, R., Fröhlich Ch., Mandl, D. (Eds.), *Handbuch Rechnungslegung – Band I: Einzelabschluss*. Vienna: Lexis Nexis.

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

Eberhartinger, E., & Petutschnig, M. (2017). § 258 UGB. In Bertl, R., Mandl, D. (Eds.), *Handbuch zum Rechnungslegungsgesetz – 20. Erg-Lfg.*

Working Papers

Amberger, H., Eberhartinger, E., & Kasper, M. (2018). Tax-Rate Biases in Tax-Planning Decisions: Experimental Evidence. Verfügbar via SSRN: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2727680

Presentations (incl. co-authors)

TAF Research Seminar (2017), Wiener Bilanzrechtstage (2017), Frühjahrstagung der Kommission Betriebswirtschaftliche Steuerlehre im VHB e.V. (2018), Tax Administration Research Centre's 6 th Annual Conference (2018)

ASS.-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 covers extensively the OECD BEPS Action Plan and its ramifications. Additionally, the research focuses on respective current initiatives of the EU Commission (Anti-Tax-Avoidance-Directive; CCCTB-Directive), primarily on interest deduction rules.

Real Estate Capital Gains Tax

The project analyzes short- and longterm effects of the introduction of a comprehensive real estate capital gains tax in Austria in 2012 on the real estate markets. The empirical analysis of real estate transactions shows a significant increase of transaction activity during the announcement phase of the tax reform and a significant increase of 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 is currently under review at an international journal.

Investment Allowances

The project (together with Ass.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, etc). Since the EU Commission has included an allowance for equity increases into its recent CCCTB draft directive the 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 is currently under review at an international journal.

PUBLICATIONS AND PRESENTATIONS

Contributions to Journals

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Petutschnig, M. (2017). Future Orientation and Taxes – Evidence from Big Data. *Journal of International Accounting, Auditing and Taxation* 29(1), 14–31.

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

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Petutschnig, M. (2017). C(C)CTB 2.0 – Der neue Richtlinien-Vorschlag der EU-Kommission zur Harmonisierung der Körperschaftssteuer. *RWZ* 9/2017, 273–283.

Editorship

Albiez, S., Petutschnig, M., & Wimpissinger, C. (Eds.). (2018). Bilanz und Haftung. Verlag Österreich.

Book Chapters

Brightwell, M., & Petutschnig, M. (2018). Änderung und Berichtigung des Jahresabschlusses im Unternehmens-, Gesellschafts- und Steuerrecht, in Albiez, S., Petutschnig, M., & Wimpissinger, C. (Eds.). Bilanz und Haftung, 207–235, Vienna: Verlag Österreich.

Contributions to Legal Commentaries

Eberhartinger, E., & Petutschnig, M. (2018). Latente Steuern (§ 198 Abs 9–10). In Bertl, R., Fröhlich Ch., Mandl, D. (Eds.), Handbuch Rechnungslegung – Band I: Einzelabschluss. Vienna: Lexis Nexis.

Kuntner, E., Petutschnig, M., & Schereda, M. (2018). Rechnungsabgrenzungsposten (§ 198 Abs 5–6). In Bertl, R., Fröhlich Ch., Mandl, D. (Eds.), Handbuch Rechnungslegung – Band I: Einzelabschluss. Vienna: Lexis Nexis.

Kuntner, E., Petutschnig, M., & Schereda, M. (2018). Disagio (§ 198 Abs 7). In Bertl, R., Fröhlich Ch., Mandl, D. (Eds.), Handbuch Rechnungslegung – Band I: Einzelabschluss. Vienna: Lexis Nexis.

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

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Lecture Notes

Kreilinger, L., Petutschnig, M., & Schallmeiner, B. (2017). Externe Unternehmensrechnung, 3. Auflage.

Dobrovits, I., Konczer, K., & Petutschnig, M. (2017). Accounting and Management Control I – Grundlagen der externen Unternehmensrechnung, 9. Auflage.

Working Papers

Petutschnig, M. (2017). Regulatory Compensation Limits and Business Performance – Evidence from the National Football League.

Mittelbach-Hörmanseder, S., Petutschnig, M., & Schneider, G. (2017). Is there a Lock-In Effect on Real Estate Markets?.

Petutschnig, M., & Rünger, S. (2017). Economic Effects of the Introduction of an Allowance for Equity Increases.

Baik, A., & Petutschnig, M. (2017). Objective or Subjective – Anti-treaty shopping policy in select Asian jurisdictions in the post-BEPS world.

Presentations

Tax Research Network 26th Annual Conference, Accounting Research Seminar VHB Jahrestagung 2017, Austrian Economic Association – Annual Meeting 2017, European Accounting Association Annual Meeting 2017, Masterseminar Taxation University of Augsburg

HARALD AMBERGER, PH.D.
RESEARCH FOCUS

Repatriation Taxes and Investment Efficiency

This study is a joint project with David Samuel and Kevin Markle and examines the effect of repatriation taxes on the investment decisions made by foreign subsidiaries of multinational corporations (MNCs). We find that a foreign subsidiary's investments are less economically optimal when its parent faces repatriation taxes on its earnings. This negative effect of repatriation taxes on investment efficiency is weaker when the parent monitors the subsidiary more closely and when the parent has a stronger need for the subsidiary's earnings to be repatriated, which is in line with agency conflicts between a parent's central management and the foreign subsidiary's management driving the observed inefficiency. Our results suggest that repatriation taxes reinforce agency conflicts within MNCs, leading to economically less efficient investment decisions at the subsidiary level.

**Determinants and Consequences
of Organizational Form Choices**

This study is a joint project with Saskia Kohlhasse. We examine the effect of international taxation on the

organizational form a multinational selects for a newly established foreign affiliate. We find that international taxation has a sizeable effect on the choice between a corporate subsidiary and a non-corporate flow-through. In addition, we find that a multinational establishing a new affiliate as a flow-through because of a tax benefit incurs costs through lower investment in that affiliate and a more complex group structure. Taken together, our results provide evidence on how tax rules shape group structures of multinationals and suggest that an asymmetric taxation of organizational forms has economic consequences.

Tax Risk and Dividend Payouts

In this project, I examine the effect of tax risk on a firm's dividend payouts. I find that firms with greater tax risk exhibit a lower probability of dividend payouts. The effect of tax risk is stronger in the presence of debt constraints and weaker for firms that distribute dividends to alleviate agency conflicts. Furthermore, I find a negative effect of tax risk on dividend levels, which is moderated by the costs of dividend reductions. Taken together, my findings document a real effect of tax risk and contribute to the understanding of interactions between risky tax strategies and a firm's financial ecosystem.



Tax-Related Information and Tax-Planning Decisions

In this joint project with Eva Eberhartinger und Matthias Kasper, we conduct a series of four laboratory experiments with 223 students and 62 tax professionals and find that individuals apply heuristics based on the salience of statutory tax rates when facing time pressure in an intra-group cross-border financing decision. This stirs decision makers to underestimate the effects of tax-base changes and causes economically suboptimal decisions. We find that tax-planning behavior is unaffected by participants' level of experience. In fact, students and highly experienced tax professionals are similarly prone to decision bias. 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, our findings suggest that tax-information salience drives tax-planning decisions.

PUBLICATIONS AND PRESENTATIONS

Working Papers

Amberger, H. (2018). Tax Risk and Dividend Payouts. Available at SSRN: <http://ssrn.com/abstract=2945877>

Amberger, H., & Kohlhase, S. (2018). The Effect of International Taxation on Organizational Form Choices: Evidence from Group Structures of Multinationals. Available at SSRN: <http://ssrn.com/abstract=2929347>

Amberger, H., Eberhartinger, E., & Kasper, M. (2018). Tax-Rate Biases in Tax-Planning Decisions: Experimental Evidence. Available at SSRN: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2727680

Amberger, H., Markle, K., & Samuel, D. (2018). Repatriation Taxes and Internal Agency Conflicts. Available at SSRN: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3138823

Presentations (incl. co-authors)

London Business School Accounting Symposium (2018), American Taxation Midyear Meeting (2018), European Accounting Association – Annual Congress (2018), Österreichischer Steuerlehretag (2017), Fakultätsforschungsseminar Universität Graz (2017), 7th Conference on Current Research in Taxation (2017), Arqus Tagung (2017), European Accounting Association – Annual Congress (2017), American Taxation Association Midyear Meeting (2017).



PAUL BREZINA, MSC (WU)

RESEARCH FOCUS

Distributed Ledger Technology and decentralization is currently a – if not the – hot topic all over the world. Since the exchange rate of Bitcoin jumped to USD 20.000,00 in late 2017, the crypto currency and all questions surrounding found its way into the mass media. Some authors even think that Blockchain, the technology behind Bitcoin, might be the biggest innovation since the introduction of the Internet. Research in this area offers many possibilities in connection with accounting and taxes. Currently Paul Brezina is working on identifying specific research questions in that field that will then be addressed in the future.

MICHAEL BRIGHTWELL, MSC (WU)

RESEARCH FOCUS

Mr. Brightwell's research focuses on Austrian and international corporate taxation where he especially concentrates on start-up-companies. This kind of companies face special challenges on raising capital and cannot pay high salaries for their employees. However, start-up-companies identified innovative salary systems such as phantom-share- or work-for-equity-agreements. Furthermore, start-up-companies found innovative ways of raising funds such as business-angel- and crowdfunding-concepts, or the Austrian Mittelstandsfinanzierungsgesellschaft (see Brightwell, M., & Luka, K. (2017). Die neue Mittelstandsfinanzierungsgesellschaft als neuer Alternative Investment Fonds (AIF). Österreichische Steuerzeitung (ÖStZ) (14), 374–379). The thesis and the research of Mr. Brightwell focuses on the tax treatment of these innovative systems in Austria and on the tax effects of different participation structures of start-ups. Additionally, he will also search for start-up and start-up-investor tax incentives in other European countries, which could improve the conditions for start-ups in their initial phase.

PUBLICATIONS AND PRESENTATIONS

Contributions to Journals

Brightwell, M., & Gewessler, K. (in press). Die steuerliche (Nicht-) Vorteilhaftigkeit der Belegschaftsbeteiligungsgesellschaft NEU: Cui bono? Österreichische Steuerzeitung (ÖStZ).

Brightwell, M., & Luka, K. (2017). Die neue Mittelstandsfinanzierungsgesellschaft als neuer Alternative Investment Fonds (AIF). Österreichische Steuerzeitung (ÖStZ) (14), 374–379.

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

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Brightwell, M., & Petutschnig, M. (2018). Änderung und Berichtigung des Jahresabschlusses im Unternehmens-, Gesellschafts- und Steuerrecht. In Albiez, S., Petutschnig, M., Wimpissinger, C. (Eds.), Bilanz und Haftung (pp. 207–235). Vienna: Verlag Österreich.

Contributions to Legal Commentaries

Brightwell, M., & Eberhartinger, E. (2018). Inhalt der Bilanz (§ 198 Abs 1–4). In Bertl, R., Fröhlich Ch., Mandl, D. (Eds.), Handbuch Rechnungslegung – Band I: Einzelabschluss. Vienna: Lexis Nexis.

STEFANIE CHROUSTOVSKY, LL.B. (WU)

RESEARCH FOCUS

Ms. Chroustovsky's research focuses on national and international taxation, e.g. the interest barrier in Austria.

PUBLICATIONS AND PRESENTATIONS

Contributions to Journals

Chroustovsky, S., & Petutschnig, M. (2017). Was bringt die EU-Zinsschranke? – Eine Simulation der Umsetzung von Art 4 der EU-Anti-Tax-Avoidance-Directive in Österreich. Österreichische Steuerzeitung (ÖStZ), 18, 477–486.

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**

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Knesl, J., Knesl, P., & Zwick, M. (2017). Antragsberechtigung eines körperschaftlich organisierten US-Investmentfonds zur KEST-Rückerstattung. *BFG Journal* (previously: *UFS Journal*) (12), 459–465.

Knesl, J., & Luka, K. (2017). Die steuerrechtlichen Auswirkungen einer Vertragsänderung bei Optionen des Altbestandes. *Zeitschrift für Gesellschaftsrecht und angrenzendes Steuerrecht (GES)* (4), 208–212.

Knesl, J., & Luka, K. (2017). Steuerrechtliche Sonderfragen im Zusammenhang mit der Liquidation von Kapitalgesellschaften. *Österreichische Steuerzeitung (ÖStZ)* (12), 305–310.

Book Chapters

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Contributions to Legal Commentaries

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Hirschler, K., & Knesl, J. (2017). § 4 Abs 10 EStG. In Büsser, S., Ehrke-Rabel, T., Fellner, K., Petritz, M., Sutter, F. (Eds.), *Die Einkommensteuer*

PATRICK LEYRER, MSc (WU)

RESEARCH FOCUS

The research activities of Patrick Leyrer, MSc (WU) concentrate on the national taxation treatments of the usufruct. There are many open questions concerning that topic. Especially in the field of the allocation to the economic ownership of the 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 on 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 taxation treatment of the usufruct. Existing loopholes should be pointed out and possible solutions should be found. Furthermore these loopholes should be demonstrated through the analysis of real issues; another point is to analyze and compare all of the different variants of the usufruct.

PUBLICATIONS AND PRESENTATIONS

Contributions to Journals

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Leyrer, P. (2017). Wirtschaftliches Eigentum bei Fruchtgenussvereinbarungen an Liegenschaften. taxlex (4), 108–111.

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Leyrer, P. (2017). Privater Grundstücksverkauf und Abzug von Werbungskosten. Steuer- und Wirtschaftskartei (SWK) (11), 584–587.

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Leyrer, P., & Komarek, E. (2017). Die steuerliche Behandlung von Fruchtgenussrechtvereinbarungen an Kapitalanteilen. Österreichische Steuerzeitung (ÖStZ) (22), 583–587.

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Leyrer, P. (2018). AfA-Ersatz bei Fruchtgenussvereinbarungen. taxlex, (3), 68–72.

Contribution to Legal Commentaries

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Hirschler, K. Frank, S., & Leyrer, P. (2017). § 4 Abs 3 EStG. In Die Einkommensteuer (EStG 1988) – Kommentar (65. Lfg). Hrsg. Hofstätter/Reichel, Wien: LexisNexis.

KATHARINA LUKA, MSC (WU) RESEARCH FOCUS

The current research of Katharina Luka focuses on the impact of BEPS Action 4 on the taxation of leasing with the aim of identifying a taxation scheme reducing the tax burden for companies but also considering the avoidance of base erosion and profit shifting. Although leasing is one of the most substantial alternatives of debt financing, a legal definition is still missing in Austria. However, especially the differentiation between operating leasing and finance leasing is essential for the allocation of the leased asset either to 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 implemented an action plan to address base erosion and profit shifting (BEPS) and, with its 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

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Brightwell, M., & Luka, K. (2017). Die neue Mittelstandsfinanzierungsgesellschaft als neuer Alternative Investment Fonds (AIF). *Österreichische Steuerzeitung*, 14, 374–379.

Knesl, J., & Luka, K. (2017). Die steuerrechtlichen Auswirkungen einer Vertragsänderung bei Optionen des Altbestandes. *Zeitschrift für Gesellschaftsrecht und angrenzendes Steuerrecht*, 4, 208–212.

Leyrer, P., & Luka, K. (2017). Renditemiete als geeigneter Gradmesser für die Beurteilung des wirtschaftlichen Eigentums? – Rechtsauffassung des BMF nicht in Judikatur gedeckt. *Österreichische Steuerzeitung*, 20, 523–529.

Knesl, J., & Luka, K. (2017). Steuerrechtliche Sonderfragen im Zusammenhang mit der Liquidation von Kapitalgesellschaften. *Österreichische Steuerzeitung*, 12, 305–310.

Contributions to Legal Commentaries

Hirschler, K., & Luka, K. (2017). § 4 Abs 4 EStG. In Büsser, S., Ehrke-Rabel, T., Fellner, K., Petritz, M., Sutter, F. (Eds.). *Die Einkommensteuer (EStG 1988) – Kommentar*. Vienna: LexisNexis.

Hirschler, K., & Luka, K. (2017). § 4 Abs 4 Z 1 EStG. In Büsser, S., Ehrke-Rabel, T., Fellner, K., Petritz, M., Sutter, F. (Eds.). *Die Einkommensteuer (EStG 1988) – Kommentar*. Vienna: LexisNexis.

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Hirschler, K., & Luka, K. (2017). § 4 Abs 4 Z 3 EStG. In Büsser, S., Ehrke-Rabel, T., Fellner, K., Petritz, M., Sutter, F. (Eds.). *Die Einkommensteuer (EStG 1988) – Kommentar*. Vienna: LexisNexis.

Hirschler, K., & Luka, K. (2017). § 4 Abs 4 Z 4 EStG. In Büsser, S., Ehrke-Rabel, T., Fellner, K., Petritz, M., Sutter, F. (Eds.). *Die Einkommensteuer (EStG 1988) – Kommentar*. Vienna: LexisNexis.

Hirschler, K., & Luka, K. (2017). § 4 Abs 4 Z 4 und Z 4a EStG. In Büsser, S., Ehrke-Rabel, T., Fellner, K., Petritz, M., Sutter, F. (Eds.). *Die Einkommensteuer (EStG 1988) – Kommentar*. Vienna: LexisNexis.

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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

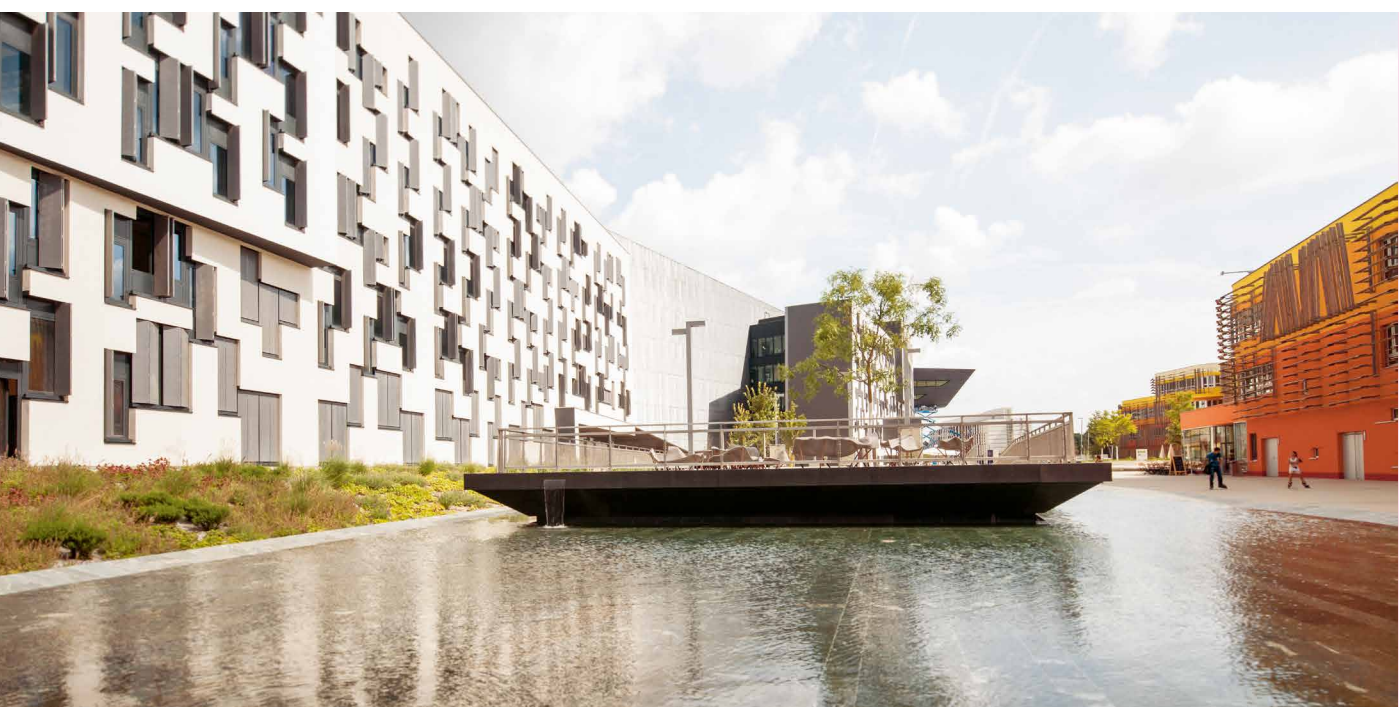
Contributions to Journals

Novosel, S., & Patloch, A. (2017). Österreichische Investitionsförderungen und der deutsche Investitionsabzugsbetrag. Eine mögliche Alternative? *Steuer- und Wirtschaftskartei (SWK)*, 92, 665–671.

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

Contributions to Legal Commentaries

Bartos, P., & Novosel, S. (2017). Kommentierung Vorräte und Forderungen. In Fritz-Schmied, G., & Kanduth-Kristen, S. (Eds.), *Bilanzpostenkommentar (BilPoKom)*.



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. (2017). Wirtschaftspolitische Maßnahmen zur Beeinflussung von Managergehältern. *Zeitschrift für Wirtschaftspolitik*, 66(2), 111–141.

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. (2017). Österreichische Investitionsförderungen und der deutsche Investitionsabzugsbetrag. Eine mögliche Alternative? *Steuer- und Wirtschaftskartei (SWK)*, 92, 665–671.

Contributions to Legal Commentaries

Geutebrück, G., & Patloch-Kofler, A. (2018). Anhangangaben für große Gesellschaften (§ 240). In Bertl, R., Fröhlich Ch., Mandl, D. (Eds.), *Handbuch Rechnungslegung – Band I: Einzelabschluss*. Vienna: Lexis Nexis.



KRISTIN RESENIQ, LL.B. (WU)

Due to her legal education she wants to focus on interfaces between tax law and tax management. Hereby she wants to evaluate economic decisions based on their legal background and its economic effects.

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

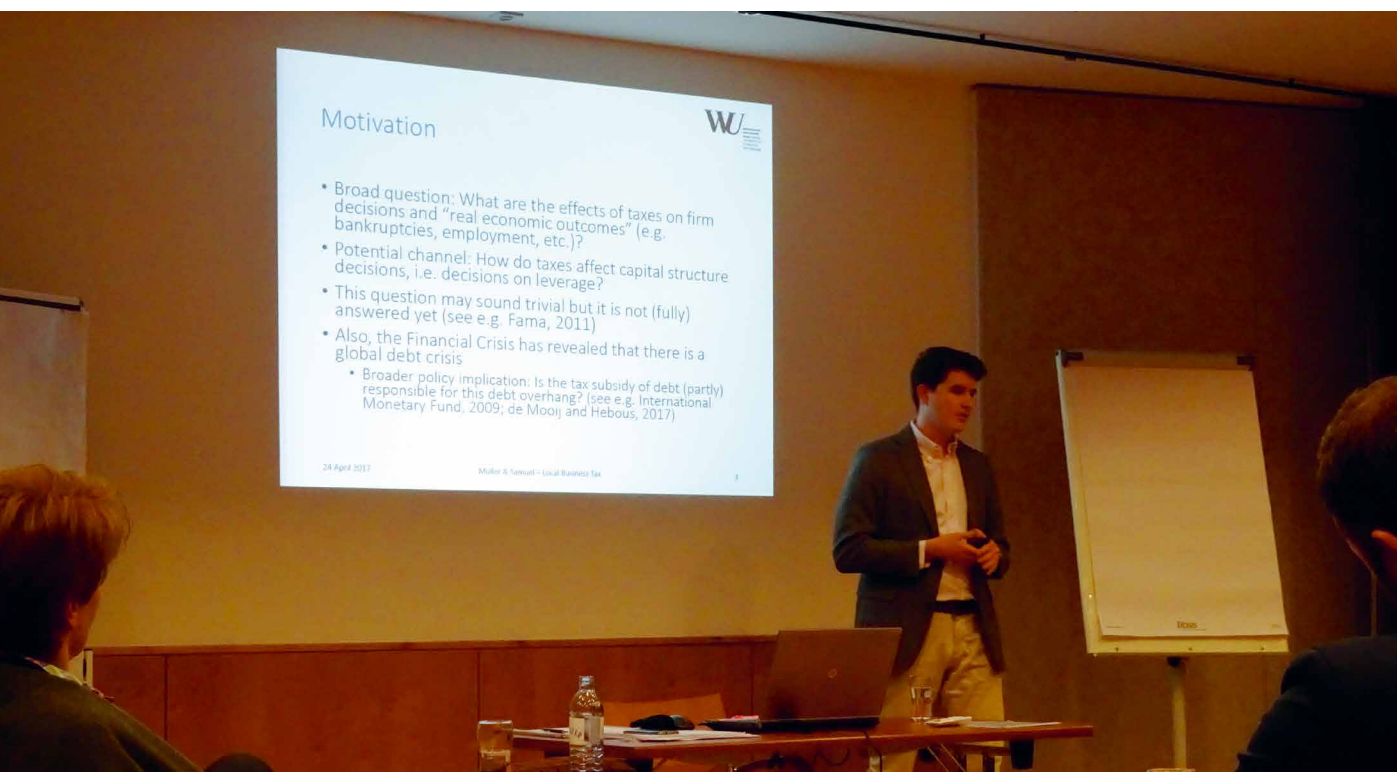
Samuel, D. (2017). Wesentliche Neuerungen für Unternehmen durch die Erbschaftsteuerreform 2016 in Deutschland. *SWI*, 27 (7), 382–387.

Working Papers

Amberger, H., Markle, K., & Samuel, D. (2018). Repatriation Taxes and Internal Agency Conflicts. Verfügbar via SSRN: https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3138823

Presentations (incl. co-authors):

41st Annual Congress of the European Accounting Association, EIASM 8th Conference on Current Research in Taxation, LBS Accounting Symposium 2018, Hawai'i Accounting Research Conference, American Taxation Association



Midyear Meeting, ATA Doctoral Consortium, University of Illinois Accounting Brownbag, Arthur Andersen Center for Financial Reporting Research Workshop (University of Wisconsin-Madison), EIASM 7th Conference on Current Research in Taxation (Ph.D. Seminar), Annual Meeting of Austrian Tax Researchers

RAFFAEL SPEITMANN, MSC (WU)
RESEARCH FOCUS

In view of the sharp increase in the regulation of the financial sector in response to the financial crisis of 2007/08, tax aspects have also become a regulatory focus in recent years. For example, Directive 2013/36 / EU requires multinational financial institutions with activities in the EU to disclose certain financial figures at country level, with the aim of providing greater tax transparency ("Country-by-Country Reporting"). One part of Mr. Speitmann's dissertation therefore deals empirically with the question of which economic consequences are directly and indirectly related to tax disclosure requirements.

STB 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. In addition, he addresses current issues in the field of income and corporation tax.

PUBLICATIONS AND PRESENTATIONS

Publications and Presentations Contributions to Journals

Weinhandl, S. (2017). Die finanz- und höchstgerichtliche Rechtsprechung zur KÖSt in der Praxis: Eine empirische Analyse (Teil 1). *ÖStZ* 22/2017, 597.

Weinhandl, S. (2017). Die finanz- und höchstgerichtliche Rechtsprechung zur KÖSt in der Praxis: Eine empirische Analyse (Teil 2). *ÖStZ* 23/2017, 632

Weinhandl, S. (2017). Die finanz- und höchstgerichtliche Rechtsprechung zur KÖSt in der Praxis: Eine empirische Analyse (Teil 3). *ÖStZ* 24/2017, 653

Contributions to Legal Commentaries

Eberhartinger, E., & Weinhandl, St. (2018). Rückstellungen (§ 198 Abs 8). In Bertl, R., Fröhlich Ch., Mandl, D. (Eds.), *Handbuch Rechnungslegung – Band I: Einzelabschluss*. Vienna: Lexis Nexis.

YUCHEN WU
RESEARCH FOCUS

In the context of globalization and the increasing tax complexity, the behavior change of the tax authority may have influence on tax behavior of MNEs. Yuchen will focus on the recent development on tax compliance programs and analyze the effect on MNEs. More specifically, whether a specific regulatory environment fosters certain tax strategies, and whether taxpayers seek tax certainty and reputational gain. This study will have policy implications on how to change firms' behaviors.



Events

We regularly host (international) events and researchers at WU

DOCTORAL RESEARCH SEMINAR

In November 2018, the "4th Vienna Doctoral Consortium in Taxation" will be held and PhD students and professors from various international universities will be invited to the WU campus. For two days, young scholars will present and discuss their research projects.

WORKSHOPS

In the fall term 2017/18, Kevin Markle (University of Iowa, USA) offered a workshop at WU on International Taxation and Profit Shifting.

ACCOUNTING RESEARCH SEMINAR

Our institute regularly invites researchers from around the world to present their research at WU. Last year, many distinguished researchers accepted our invitations and presented at WU. We were extremely pleased to host Dietmar Aigner (JKU Linz), Charles H. Cho (Schulich School of Business), David Godsell (University of Illinois at Urbana-Champaign), Axel Haller (University of Regensburg), Kevin Markle (University of Iowa), Sabine Kanduth-Kristen (University of Klagenfurt), Sebastian Kronenberger (University of Hanover), Cristina Landis (University of Regensburg), Leslie Robinson (Tuck School of Business), Barbara Schöndube-Pirchegger (University of Magdeburg), and Katrin Weiskirchner-Merten (WU Vienna).





Information and contact

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Bus: 82A, "Südportalstraße" stop