

Academic Report 2021-2022

Business Taxation Group

Institute for Accounting & Auditing



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Introducing the Group

This academic report is intended to provide all interested people with information about the teaching and research activities of the Business Taxation Group of WU (Vienna University of Economics and Business). It provides an overview of the activities in the academic year 2021/2022 and is aimed in particular at academic colleagues, students and the business community and tax practice.

The Business Taxation Group under the direction of Univ.Prof. Dr. Eva Eberhartinger forms together with the Financial Accounting and Auditing Group (Univ. Prof. Dr. Ewald Aschauer), the Management Accounting and Control Group (Univ.Prof. Dr. Christian Riegler), the Accounting, Taxation and Auditing Group (Univ.Prof. Dr. Klaus Hirschler), the International Accounting Group (Univ.Prof. Dr. Zoltán Novotny-Farkas) and the Accounting and Reporting Group (Univ.Prof. Dr. Katrin Hummel) the Institute for Accounting and Auditing at WU.

The teaching activities of the Business Taxation Group focus on (corporate) tax norms, effects, and structures. We prepare students for careers as tax consultants / tax advisors, but also for careers in in-house corporate tax departments, financial institutions, tax administrations as well as other 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 consulting firms and other companies.

The Business Taxation Group, together with other departments and institutes of WU, services degree programs at all levels: the course "Financial Reporting and Analysis" of the Bachelor program "Bachelor in Business and Economics" (BBE), the specialization track "Accounting and Taxation" in the bachelors' programs, and the master's degree programs in Finance and Accounting and in Taxation and Accounting.

In addition to its regular doctoral program, the Group also offers the Doctoral Program in International Business Taxation (DIBT), which was positively reviewed by a commission of experts in autumn 2019 and further financing by the Austrian Science Fund (FWF) was secured.

Members of the Business Taxation Group have contributed extensively to the research areas of tax accounting, domestic and international 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 present our achievements in teaching and research on the following pages.

Again, the 2021/2022 academic year was marked by the COVID 19 pandemic. Thus, some courses still had to be held in online mode and some days had to be spent in the home office. The home office days were fortunately few and far between, and the majority of the courses could again be held in direct personal contact with the students. Also in research the return from the home office had a stimulating effect.

Particularly worthy of mention this year are the achievements of Nadia Genest, PhD, Raffael Speitmann, PhD, and Yuchen Wu, PhD who have completed their doctoral studies and of Mr. Franz Ehrnhöfer who completed his master's degree and will start his doctoral studies at our Group in autumn 2022.

We congratulate very warmly on these achievements!

Univ.Prof. Dr. Eva Eberhartinger
Assoc.Prof. Dr. Matthias Petutschnig

FACULTY (AS OF JUNE 2022)

The group's staff are introduced here. For further information on individual research activities, please refer to the chapter [Research Projects](#) (the hyperlink will directly guide you to the respective section of the report).



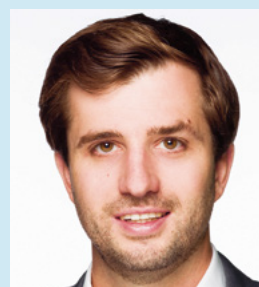
PROF. DR. EVA EBERHARTINGER, LL.M. (EXETER)

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.



ASSOC. PROF. DR. MATTHIAS PETUTSCHNIG, StB

is an Associate Professor at the Business Taxation 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 Prof. 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.



ASS. PROF. HARALD AMBERGER, PhD

is an Assistant Professor post-doc at our group. In addition, he has served as a Research Fellow at Dartmouth College and as a Visiting Assistant Professor at the University of Iowa. He received his doctorate „sub auspiciis Praesidentis rei publicae“ after completing the Doctoral Program in International Taxation (DIBT) at WU. For his dissertation he was awarded the Stephan-Koren-Prize. In his current research projects he investigates the influence of taxes on business decisions (e.g. financing and investment decisions, choice of legal form, dividend distribution behavior) as well as the impact of the transparency of beneficial ownership on cross-border capital flows. In doing so, he applies empirical as well as experimental research methods. He is admitted as a permanent visiting researcher at the Deutsche Bundesbank. He is also a reviewer for renowned journals (e.g. The Accounting Review, Review of Accounting Studies and Contemporary Accounting Research) and a member of the Editorial Board of the Journal of the American Taxation Association.



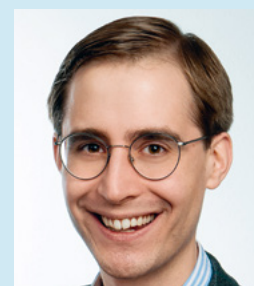
MARUFA AKHTER, MSc

Marufa was born in Bangladesh. She studied Business Administration (BBA in 2015; MBA in 2016) at Jahangirnagar University. After that she pursued her second masters in science (MSc) in Accounting and Finance from the University of Essex in 2018-19, with distinction. She also worked shortly between her bachelor and masters in a non-banking financial institute in Bangladesh in 2016. She became interested in the governance systems of corporations and their disclosure strategies. Later, her interest expanded to corporate taxation. During her student life, she had been working in different startups part-time and in university clubs.



SYLVIA AUER, MSc (WU)

successfully completed the master program Taxation and Accounting at WU in May 2019. Since September 2019, she holds a position as Research and Teaching Associate prae-doc at the Business Taxation Group at WU. Previously, she held an associate position with a focus on mergers and acquisitions at a large tax consulting firm. In her current research, Sylvia Auer, together with Prof. Eva Eberhartinger and Tobias Bornemann, investigates the influence of corporate tax aspects on the investment behavior of European banks. Moreover, she investigates the impact of IFRS on corporate tax payments together with Georg Winkler and Karoline Els. Finally, her research deals with qualitative tax disclosures.



PAUL BREZINA, MSc (WU), StB

is Research and Teaching Associate, externally funded by ABG Wirtschaftsprüfungs & Steuerberatungs GmbH. He holds a master's degree in Taxation and Accounting from WU Vienna. In April 2017, he was appointed as austrian tax advisor. Currently, his research focuses on questions in connection with Cryptoeconomy and Blockchain-Technology.



FRANZ EHRRNHÖFER, MSc (WU)

Franz was a student assistant in our department during the 2021/2022 academic year. Starting with the winter term 2022/2023 he will support us as a third party funded Research and Teaching Associate prae-doc (funded by Deloitte) and will start his doctoral studies.



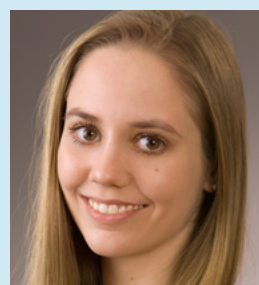
NADIA GENEST, LL.M., PhD

Nadia was born in Canada. Since June 2020 she is an Assistant Professor at HEC Montreal at the Department of Accounting Studies. She studied business administration with specialization in accounting and management, and she received a Master of Laws (LL.M.) with a specialization in taxation from HEC Montreal (Canada). She is a Chartered Professional Accountant and has more than five years of experience as a tax consultant in Canada, where she advised corporations and individuals on various matters related to Canadian taxation. Nadia was able to successfully complete her doctoral studies in the DIBT program in the spring of 2022.



AGUS HIDAYAT, M.P.F.

Agus was born in Medan, Indonesia. He finished his diploma degree at the State College of Accountancy (2000) and his bachelor degree at the University of Medan Area (2006) – both in accounting. He was awarded the Joint Japan and World Bank Graduate Scholarship (2012) to continue with his master degree at the National Graduate Institute for Policy Studies (GRIPS) in Tokyo, Japan, where he obtained a Master of Public Finance (MPF). Agus has been working as a tax officer for the Indonesian Tax Authority for almost 20 years, having held various positions such as tax auditor, objection reviewer, account representative and section chief. His research interests include tax compliance, the OECD BEPS Project and other international taxation issues.



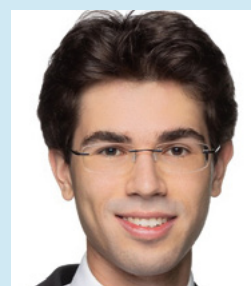
KATRIN LACKNER, MSc (WU)

Katrin worked at our group from February 2021 until June 2022, first as a student assistant and then as a Research and Teaching Associate prae-doc. Currently, she is employed in the tax consulting industry.



AYSE SULE OZDOGAN, MIA, MSc

studied Business Administration (BSc) and received a master's degree specializing in international competitiveness in Ankara, Turkey. After a short career as a Finance Associate, she worked at the Ministry of Economy in Turkey from 2006 till 2015 as a case handler in company investigations, where she analyzed international business transactions of foreign companies, on-spot, for unfair pricing practices against Turkey. After receiving her second master's degree in international economy and finance from Columbia University, she was appointed as the Commercial Counsellor to the Turkish Embassy in Vienna. In 2019 she started her PhD in International Business Taxation (DIBT). She researches company-specific aspects related to the avoidance/reduction of customs and other import duties.



CHRISTIAN RENELT, MSc (WU)

Christian joined our academic group as a Research and Teaching Associate prae-doc in September 2021. In his dissertation project, he is researching the role of the tax department of multinational enterprises in investment decisions.



MAG. SABINE RETTIG

worked for two years in the International Accounting Group at WU. Since October 2016, she has been working in the Business Taxation 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 teaching activities.



FERNANDO SIAHAAN, MSc

Fernando Siahaan was born in Indonesia. He obtained a Bachelor of Economics degree from University of Indonesia in 2007. He started his career as Junior Tax Consultant and joined the Directorate General of Taxes Republic of Indonesia by 2009. In 2013-2014 he continued his study with Master of Science in Accountancy and Control at the University of Amsterdam, sponsored by the World Bank Spirit Scholarship. Since 2018, his job position is The Head of Taxpayers Supervision and Consultation Section, and as of 2020 he is also The Acting Head of Tax Collection Section in one Tax Office in Indonesia. He teaches tax lectures in several universities and institutions in Jakarta.



BERNHARD WINKELBAUER, MSc (WU), LL.M.

successfully completed his master degrees in Taxation and Accounting and in International Tax Law in September 2019. Since September 2019 he is working as a third party funded Research and Teaching Associate prae-doc at the Business Taxation Group and as a tax consultant at TPA. As part of his research, he deals with national and international tax law, in particular with the impact of taxes on corporate decisions.



GEORG WINKLER, MSc (WU)

successfully completed the master's degree Taxes and Accounting at WU, after he graduated from the bachelor programs in Business and Law as well as Applied Business Management at Alpen-Adria-University Klagenfurt. Since April 2020 he has been working as Research and Teaching Associate prae-doc at the Business Taxation Group. Before that, he worked in a renowned law firm in its tax practice. As part of his research, he deals with the impact of exit tax regulations on the location choice of european companies.



XIXI ZHANG, MSc

holds a BA with a major in English, and minor in Accounting from the China Women's University. Before starting her master studies, she spent one year working as financial intern at GE Healthcare. She received a MSc from the University of Mannheim. She spent an exchange semester abroad at Kozminski University (2018). Since September 2019, she has been studying in the Doctoral Program in International Business Taxation (DIBT) at WU. As part of her research she deals with the connection between public reporting on tax avoidance and the reputation of the company concerned. Moreover, her research focuses on how tax policies affect corporate investment decisions.

GUEST FACULTY AND VISITING RESEARCHERS

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

Nicole Hermanki, MSc

is working as a tax consultant in Vienna

Dr. Kristin Resenig, LL.M. (WU)

is working as a tax consultant at EY in Vienna

Raffael Speitmann, PhD

is working in a research role for the European Commission

Yuchen Wu, PhD

is a post-doc researcher at LMU Munich

Mag. Maximilian Zieser, PhD

works at the Austrian Institute for Technology (AIT) and still
supports our Group as an external lecturer

Our academic year 2021/2022

36



completed
**Bachelor's and
Master's Theses**

27



Publications

16



**Speeches
& Presentations**



18

Members

9 Female
9 Male



6

**External
Lecturers**

15



**Research
Seminars**

7



different
**First
Languages**

39



held **Courses**

5



finished
Dissertations

4586

Cups of Coffee



1086

**PCR-Tests
taken**



Teaching

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

BACHELOR'S PROGRAM – BUSINESS AND ECONOMICS (BBE): FINANCIAL REPORTING & ANALYSIS

Within the fully English-taught bachelor's program business and economics (BBE) the Business Taxation Group oversees the course Financial Reporting & Analysis. It provides first-year students with basic skills in reporting and analysis of financial statements. Furthermore and together with the Accounting, Taxation and Auditing Group and the Financial Accounting and Auditing Group we offer the specialization "Accounting & Taxation". Our Group is responsible for the administration of the specialization and is involved with three courses on the basic principles of corporate taxation and on international tax planning and a literature seminar, which also prepares the students for their bachelor thesis.

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 Business Taxation 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

CLASSES OFFERED IN MASTER'S PROGRAMS

The Business Taxation 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 Business Taxation 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; Special Issues of Business Taxation and Choice of Legal Form; 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/en/programs/masters-programs/finance-and-accounting/overview

Master's Program in Taxation and Accounting

The Business Taxation 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 Business Taxation; 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/en/programs/masters-programs/taxation-and-accounting/overview

Supervised Master's Theses

All master's students must submit a master thesis. Through the master 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 in 2021/2022:

Beringer, J.: Reaktion von Stakeholder auf Steuerplanung
Binder, B.: Die Bilanzierung von Leasingverhältnissen – Qualitative und quantitative Auswirkungen von IFRS 16 auf ATX-Unternehmen

Diexer, M.: Steuerliche Auswirkungen von Begünstigungen, Zuschüssen und Vorteilen aus unternehmenssteuerlicher Sicht (mit besonderem Fokus auf die COVID-19 Maßnahmen)

Dwornikowitsch, D.: Die degressive Abschreibung im Unternehmens- und Steuerrecht

Ecevit, S.: Auswirkungen der Neuregelungen zur Zins-schranke auf Unternehmen und Unternehmensgruppen

Ehrnhöfer, F.: Der „Ort der Geschäftsleitung“ im Lichte polyzentrischer Geschäftsführung – eine Analyse anhand der Rechtsprechung und Literatur

Huss, C.: Qualitative Unternehmensberichterstattung im Zusammenhang mit Steuern: Ein internationaler Vergleich

Jilg, C.: DAC 7 und seine möglichen Auswirkungen auf österreichische Unternehmen

Kaiserauer, D.: Effektive Steuersätze österreichischer Unternehmen - Eine empirische Analyse

Lackner, K.: Länderspezifische Berichterstattung – Eine empirische Analyse

Lechner, M.: GloBE und METR - Die aktuellen Vorschläge für eine globale Mindeststeuer

Leikam, B.: Steuerliche Aspekte einer Liquidation

Mandl, E.: Die Wirkung von Investitionsbegünstigungen – ein Überblick über die empirische Literatur

Muckenhuber, C.: Determinanten effektiver Steuersätze österreichischer Konzerne

Müldner, R.: Steuerliche Maßnahmen zum Klimaschutz im internationalen Vergleich

Sattler, M.: Die Wirkung von CO2-Steuern – Ein Überblick über die empirische Literatur



Schön, A.: Missbräuchliche Holdinggestaltung? – Eine Analyse der Judikatur

Weinmann, T.: Auswirkungen von Covid-19 auf die Rechtsformwahl – Ein steuerlicher Vergleich zwischen den bedeutendsten Rechtsformen in Österreich

Zach, N.: Der sachliche Anwendungsbereich des EU-MPFG

Zimmer, J.: Digitalisierung von Immobilieninvestitionen für Kleinanleger.

DOCTORAL STUDIES

Doctoral Program at WU

The Business Taxation 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 Business Taxation Group offers an additional research seminar for doctoral candidates which looks at particular questions regarding business taxation, 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 2019, it was subject to a second 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. Rust, and Prof. Pistone (all WU);
- › business taxation: Prof. Eberhartinger, Prof. Petutschnig, Prof. Novotny-Farkas (all WU) and Prof. Sureth-Sloane (WU and University of Paderborn);
- › economics: Prof. Zagler and Prof. Sausgruber (both WU), Prof. Langenmayr (University Eichstätt-Ingolstadt) and Prof. Weichenrieder (University of Frankfurt).

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 and Prof. Petutschnig are continuously supervising dissertations written as part of the WU general PhD program, as well as part of the structured PhD program (DIBT). During the academic year 2021/2022, the following dissertations were successfully completed under their supervision:

Genest, N.: Perspectives on Tax Transparency

Karolyi, B.: The Compatibility of Turnover-based Business Taxes with EU Law and WTO Law

Shehaj, P.: Deliberation about international taxation issues

Speitmann, R.: Business Taxation: The Role of Trust, Transparency, and Reputation

Wu, Y.: Tax, trust and transparency



For further information, please visit:
wu.ac.at/dibt
 and
fwf.ac.at/de/wissenschaft-konkret/im-fokus-doktoratskollegs/w1235

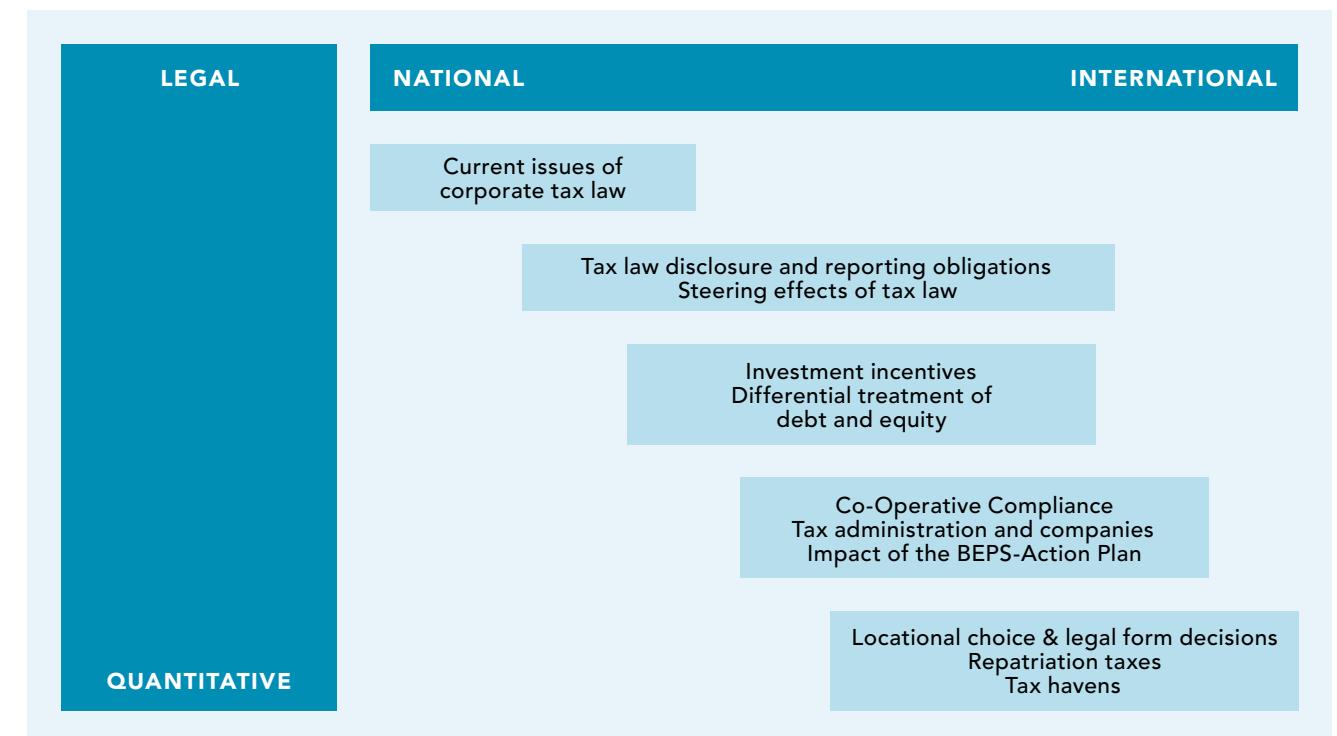
Research

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.



Research Projects

EDITORSHIPS

The annual conference series **Wiener Bilanzrechtstage** has been taking place at WU since 2000 and is cooperatively organized by the Institute for Accounting and Auditing, the Institute for Austrian and International Tax Law, the Institute for Corporate Law, and the Academy of tax Consultants and Auditors (Akademie der Steuerberater und Wirtschaftsprüfer). The Findings of the conference relevant to science and practice are regularly made available for a wide audience through contributions to an anthology. Prof. Eberhartinger and Prof. Petutschnig are along with other researchers from WU co-editors of the annual anthology.

Prof. Petutschnig is a member of the editorial board of the **Journal for International Accounting, Auditing and Taxation**. Ass.-Prof. Amberger is a member of the Editorial Board of the **Journal of the American Taxation Association**. Furthermore, all members of the Business Taxation Group are regular reviewers of scientific articles for numerous international periodicals (including AinE, EAR, Finanzarchiv, DBW, TAR, RASSt, CAR, JATA, JAPP, ABR, ZfB) and conferences (including EAA, AAA, CAAA, NTA, JATA, VHB).

COOPERATIONS WITH TAX PRACTICE

The Business Taxation Group aims to foster the exchange of ideas between science and practice. An essential part of this is close cooperation with (inter)national tax consulting businesses as well as other companies. The close collaboration is beneficial not only for students and companies, but also for teaching and research. It allows the students to directly engage with practice-relevant questions and benefit from feedback.

The 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, EY, Deloitte, KPMG** and **TPA**, which take place in 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, EY, KPMG** and **TPA** which all support the financing of research and teaching assistants.

Furthermore, members of the group are active in consultative committees and interest groups, such as the Austrian Financial Reporting and Auditing Committee (**AFRAC**) or the Expert Senate for Tax Law of the Chamber of Tax Advisors and Certified Public Accountants (**KSW**).

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

Prof. Eberhartinger conducts research in many areas of national and international business taxation. At the moment she focuses on the following areas:

Effect of taxes on multinational enterprises

On the one hand, questions regarding the effect of the now increased disclosure of taxes in the annual and consolidated financial statements are being dealt with. On the other hand, the effects of the recent discussion on the avoidance of Base Erosion and Profit Shifting (BEPS) on group taxation and the link between Pillar Two and financial accounting are the subjects of current research. Another project is devoted to the impact of fair value taxation on investment decisions.

Tax administration and companies

One research project is dedicated to the impact of risk profiling, which is used by the tax administration to select companies for tax audits, on the tax behavior of companies and on the success of the tax administration. Another project analyzes the impact of greater automation of audits of SMEs.

ASSOC.PROF. DR. MATTHIAS PETUTSCHNIG, StB

In his current research projects Prof. 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; DEBRA-Directive), primarily on interest deduction rules.

Allowance for Corporate Equity

The project (together with Assoc.Prof. Dr. Silke Rünger – University of Graz) focuses on the effectiveness of Allowances and Premiums for Investment activity and Allowances for Corporate 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 published the DEBRA-Directive Draft the research has gained particular relevance.

ASS.PROF. HARALD AMBERGER, PhD

The impact of Beneficial Ownership Transparency on Cross-Border Capital Flows

This project, conducted jointly with Jaron Wilde and Yuchen Wu, investigates whether and to what extent the transparency of the beneficial ownership of companies (implemented in Austria by the WiEReg) changes cross-border capital flows. The results show that this transparency initiative has on average no impact on the volume of capital flows from non-EU countries to the EU member states. However, further analyses suggest that capital flows from offshore financial centers to the EU decreased after the introduction of the transparency initiative. This effect is driven in particular by disclosure rules that provide for public access to information on the beneficial owner.

The concentration of comparable transactions and cross-border profit shifting

This project, which is being conducted jointly with Benjamin Osswald investigates the relationship between the concentration of comparable transactions and tax-motivated profit shifting. The results show that an increasing concentration of comparable transactions in the hands of a few companies (measured by the relative number of patents held) facilitates cross-border profit shifting. This effect is due to the fact that an increasing concentration of information reduces the information of tax authorities. This makes it easier to defend aggressive tax planning vis-a-vis tax authorities and favors cross-border profit shifting.

The impact of the U.S. tax reform on Corporate Acquisitions abroad

This project, which is being conducted jointly with Leslie Robinson examines the impact of the 2017 U.S. Tax Reform on the activity of U.S. companies in the international acquisition market. The results show that the likelihood of a foreign company being acquired by a U.S. buyer has decreased on average while the activity of buyers outside the U.S. has not changed. The decline in takeover activity occurs particularly at U.S. companies that had high cash reserves abroad before the reform. For purely domestic U.S. companies, on the other hand, there is a relative increase in takeover activity.



MARUFA AKHTER, MSc

Marufa Akhter has been studying in the DIBT program since September 2021 at WU. Her research activities focus on EU tax policy changes and their impact at the firm level. She is currently researching the effect of anti-hybrid rules in the EU Parent-Subsidiary Directive and Anti Tax Avoidance Directive (ATAD) on firms' tax avoidance.

SYLVIA AUER, MSc (WU)

In the context of her dissertation, Sylvia Auer together with Prof. Eva Eberhartinger and Tobias Bornemann, is investigating the influence of corporate tax aspects on the investment behavior of European banks. She also works together with Georg Winkler and Karoline Els on the impact of International Financial Reporting Standards (IFRS) on corporate tax payments. Furthermore, her research focuses on the disclosure of qualitative tax information. Her further research activities focus on national and international tax law, in particular its effects on corporations.

PAUL BREZINA, MSc (WU), StB

Digital transformation is the buzz word of our time which affects every area of life. Even tax law and corporate law are more and more affected. In his research, Paul Brezina is looking into questions around digitalisation and tax/corporate law but also tax administration. So far, his focus lies on crypto currencies and tokens and how they should be treated in accounting and tax law.

AGUS HIDAYAT, M.P.F.

Agus' current research projects deal with tax avoidance and tax collection. He is investigating whether the application of BEPS Action 13 reduces tax avoidance. In addition, Agus is investigating the role of tax administrations, such as the segmentation and specialization of tax offices in tax avoidance, as well as the impact of tax audits on tax compliance. Most of his research uses Indonesian taxpayer data and thus allow important conclusions about tax compliance in emerging markets.

AYSE SULE ÖZDOĞAN, MIA, MSc

Asye's research is concerned with the effects of different import and export duties on business decisions. The main focus is on how supply chain decisions of companies as well as the choice of production locations and production intensities are affected by the introduction of (punitive) tariffs.

CHRISTIAN RENELT, MSc (WU)

In his research, Christian is concerned with the role of the corporate tax department in investment decisions. Thereby the role of taxes in investment decisions and whether the type and intensity of the tax function's involvement influences the investment decisions is researched. The aim is to empirically determine the influence of the organizational consideration of taxes on corporate investments for the first time.

FERNANDO SIAHAAN, MSc

Fernando examines the impact of different modes of tax collection on corporate tax compliance, in particular on the timeliness of tax payments. In addition, he is working together with Ass.Prof. Harald Amberger and Prof. Caren Sureth-Sloane on the effects of the introduction of a turnover based corporate income tax on corporate risk taking. He is also working on a study on tax complexity in the Indonesian tax administration.

BERNHARD WINKELBAUER, MSc (WU), LL.M.

Bernhard is empirically researching the incentive effects of tonnage taxation systems. He investigates whether tonnage taxation systems lead to a relocation of the port of registration of container ships. In another project, he is investigating the impact of the DAC 8 draft on trading behavior with crypto-currencies.

GEORG WINKLER, MSc (WU)

In his research, Georg is particularly concerned with the effects of Exit Taxation Regimes on the locational choices of companies in the EU. In addition, together with Sylvia Auer and Karoline Els he researches the effects of IFRS on tax payments of companies. Furthermore, he focuses on the interaction of Pillar Two and financial accounting rules.

XIXI ZHANG, MSc

Since September 2019, Xixi has been studying in the DIBT at WU. She researches the interaction between public reporting on tax avoidance and the reputation of the company concerned. Her research also focuses on how tax policies affect corporate investment decisions.



Publications and Presentations

We regularly publish our research results in international peer-reviewed journals, national practitioners' journals, edited volumes, anthologies and books

PEER-REVIEWED JOURNALS

Amberger, Harald, Volatility of Tax Payments and Dividend Payouts. *Contemporary Accounting Research* 2022 (online first).

Amberger, Harald / Eberhartinger, Eva / Kasper, Matthias, Tax-Rate Biases in Tax Decisions: Experimental Evidence. *Journal of the American Taxation Association* 2022 (online first).

Eberhartinger, Eva / Speitmann, Raffael / Sureth-Sloane, Caren / Wu, Yuchen, How Does Trust Affect Concessionary Behavior in Tax Bargaining? *FinanzArchiv – Public Finance Analysis* 2022, 112-155.

Petutschnig, Matthias / Rechbauer, Martina / Winkelbauer, Bernhard, Führt die Hinzurechnungsbesteuerung der ATAD zu einem Rückgang der Investitionen in Steueroasen? Empirische Evidenz aus Österreich. *BFuP* 2021, 385-411.

Petutschnig, Matthias / Rünger, Silke, The Effect of an Allowance for Corporate Equity on Capital Structure: Evidence From Austria. *Public Finance Review* 2022, 597–642.

Steens, Bert / Roques, Thibaut / Gonnet, Sébastien / Beuselink, Christof / Petutschnig, Matthias, Transfer pricing comparables: Preferring a close neighbor over a far-away peer? *Journal of International Accounting, Auditing and Taxation*, 2022 (online first).

PRACTICIONER'S JOURNALS

Amberger, Harald / Lackner, Katrin, Die Umsetzung des öffentlichen Country-by-Country Reporting durch Kreditinstitute: Eine empirische Analyse. *RWZ* 2021, 379-386.

Auer, Sylvia / Petutschnig, Matthias / Resenig, Kristin, Einkünfte aus unkörperlichen Wirtschaftsgütern im Lichte des § 10a KStG. *taxlex* 2021, 248-253.

Auer, Sylvia / Winkler, Georg, Normenkollision: Die steuerliche Behandlung unkörperlicher Wirtschaftsgüter bei Erbschaft oder Schenkung. *ÖStZ* 2021, 435-442.

Eberhartinger, Eva / Lackner, Katrin, Standort Österreich – Analyse von CbCR-Daten. *SWI* 2021, 610-620.

Eberhartinger, Eva / Winkler, Georg, Pillar One & Pillar Two: Die Internationalisierung der umgekehrten Maßgeblichkeit? *RWZ* 2022, 145-152.

Eberhartinger, Eva, „Die Mindestbesteuerung wird internationale Steuergestaltungen nicht zur Gänze beenden“ – Interview im BFG Journal. *BFG Journal* 2022, 74-76.

Hirschler, Klaus / Petutschnig, Matthias, Degressive Abschreibung und IFB – eine betriebswirtschaftliche Analyse zweier steuerlicher Investitionsbegünstigungen. *ÖStZ*, 268-280.

Kerbl, Gerald / Albl, Alexander / Winkelbauer, Bernhard, Wann beginnt der Vorsteuerberichtigungszeitraum bei Immobilien zu laufen? *SWK* 2022, 25-31.

Petutschnig, Matthias / Renelt, Christian, Die (mögliche) Diskrepanz zwischen steuerlicher degressiver AfA und tatsächlichem Nutzungsverlauf. *ÖStZ*, 645-653.

Petutschnig, Matthias / Renelt, Christian, Ein neuer (Öko-)Investitionsfreibetrag ante portas – Das Zusammenspiel von IFB und invGFB. *taxlex* 2022, 14-22.

Petutschnig, Matthias / Winkelbauer, Bernhard / Winkler, Georg, Investitionsfreibetrag und latente Steuern. *RWZ* 2022, 55-59.

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EDITED VOLUMES, ANTHOLOGIES & BOOKS

Amberger, Harald / Brezina, Paul, Die bilanzielle Behandlung ausgewählter steuerlicher COVID-19-Maßnahmen, in Mittelbach-Hörmanseder/Schiebel (Hrsg), *Rechnungswesen und Wirtschaftsprüfung – Aktuelle Fragestellungen der Rechnungslegung und angrenzender Themengebiete*. Festschrift für Romuald Bertl (2021), 143-163, Wien: LexisNexis.

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Hermanki, Nicole / Petutschnig, Matthias, Pauschale Forderungsbewertung im Steuerrecht – Die neue Maßgeblichkeit des UGB, in Mittelbach-Hörmanseder/Schiebel (Hrsg), *Rechnungswesen und Wirtschaftsprüfung – Aktuelle Fragestellungen der Rechnungslegung und angrenzender Themengebiete*. Festschrift für Romuald Bertl (2021), 987-1002. Wien: LexisNexis.

Petutschnig, Matthias, Die Immobiliengesellschaftsklausel des Art 13 (4) OECD-MA und ihre Bedeutung in der österreichischen Abkommenspolitik, in Hirschler/Fuhrmann/Bernwieser (Hrsg), *Umgündungen & Immobilien*. Festschrift für Gottfried Sulz (2022), 57-72, Wien: Linde Verlag.

Petriz, Michael / Petutschnig, Matthias, Reichweite der erforderlichen Offenlegung für die Bindungswirkung von Auskünften nach § 118 BAO, in Fraberger/Plott/Walter (Hrsg), *Gegenwart und Zukunft des Konzernsteuerrechts*. Festschrift Hans Zöchling (2022), 645-654, Wien: Linde Verlag.

Winkelbauer, Bernhard / Winkler, Georg, Pauschale Rückstellungen im EStG – Die neue Maßgeblichkeit des UGB, in Mittelbach-Hörmanseder/Schiebel (Hrsg), *Rechnungswesen und Wirtschaftsprüfung – Aktuelle Fragestellungen der Rechnungslegung und angrenzender Themengebiete*. Festschrift für Romuald Bertl (2021), 1027-1044. Wien: LexisNexis.

EDITORSHIPS

Aschauer, Ewald / Bertl, Romuald / Eberhartinger, Eva / Eckert, Georg / Egger, Anton / Hirschler, Klaus / Hummel, Katrin / Kalss, Susanne / Kofler, Georg / Lang, Michael / Novotny-Farkas, Zoltán / Nowotny, Christian / Petutschnig, Matthias / Riegler, Christian / Rust, Alexander / Schuch, Josef / Spies, Karoline / Staringer, Claus (Hrsg), Kauf und Verkauf von Unternehmen. Wiener Bilanzrechtstage 2021 (2022). Wien: Linde Verlag.

PRESENTATIONS & SPEECHES

Amberger, Harald / Robinson, Leslie, The Initial Effect of U.S. Tax Reform on Foreign Acquisitions. Universität Mannheim, Mannheim, Deutschland, 23.11.2021

Amberger, Harald / Kohlhase, Saskia / Voget, Johannes, Tax Avoidance Opportunities and Anticipatory Changes in Executive Compensation. 7th Berlin-Vallendar Conference on Tax Research, Online, 26.-27.08.2021.

Amberger, Harald / Wilde, Jaron / Wu, Yuchen, Ownership Transparency and cross-border Investment. Indiana Spring Tax Camp, Bloomington, Indiana, USA, 22.05.2022.

Amberger, Harald, Ko-Referat von Tax Enforcement and Foreign Investment by Multinational Corporations: Evidence from Tax Inspectors Without Borders. 8th Berlin-Vallendar Conference on Tax Research, 23.-24.06.2022.

Events

We regularly host (international) events and researchers at WU.

Auer, Sylvia / Bornemann, Tobias / Eberhartinger, Eva, Does fair value taxation affect banks' investment portfolio and risk-taking? 11th EIASM Conference on Current Research in Taxation, Münster, Deutschland, 12.07-13.07 2021.

Eberhartinger, Eva / Leigh-Pemberton, Jonathan / Burgers, Irene, Developing a framework for an external assurance of a company's Tax Control Framework. Cooperative Compliance: A Multi-Stakeholder and Sustainable Approach to Taxation, Wien, Österreich, 21.03.-22.03.2022.

Eberhartinger, Eva, Besondere Herausforderungen für den Prüfungsausschuss aus Sicht der Praxis. Online-Konferenz: Besondere Herausforderungen für den Prüfungsausschuss von Unternehmen von öffentlichem Interesse, Wien, 14.09.2021

Eberhartinger, Eva, The Role of Tax Administration. Tax Policy in the Post Covid 19 Era. Portuguese Public Finance Council: Sustainable Tax Policy Lissabon, 10.12.2021.

Eberhartinger, Eva, Transformation - Management des Wandels. 75. Deutscher Betriebswirtschaftler-Tag der Schmalenbach Gesellschaft, Düsseldorf, 22.09.2021.

Eberhartinger, Eva, Pillar 2 and the Accounting Standards. Seminar on Pillar Two, Lissabon, 21.04.-22.04.2022.

Eberhartinger, Eva / Safaei, Reyhaneh / Sureth-Sloane, Caren / WU, Yuchen, Are Risk-based Tax Audit Strategies Rewarded? An Analysis of Corporate Tax Avoidance. Tax Administration Research Center, Exeter, 10.11.2021.

Eberhartinger, Eva, Panel-Discussion „Emerging Issues in International Taxation Research“. American Accounting Association – Annual Meeting, San Diego, 01.08.-03.08.2022.

Özdoğan, Ayse, Importer Behavior After Targeted Tariff Increases: A Firm Level Analysis. VHB-Jahrestagung 2022, 08.03.-10.3.2022

Winkler, Georg, Exit Tax und die Standortwahl von Kapitalgesellschaften. Österreichischer Steuerlehretag, Villach, 20.09.2021.

Zhang, Xixi / Petutschnig, Matthias, Mutual Agreement Procedure and Foreign Direct Investments: Evidence from Firm-Level Data. American Accounting Association – Annual Meeting, San Diego, 01.08.-03.08.2022.

Zhang, Xixi, Consumer Reactions to Negative Tax News. VHB-Jahrestagung 2022, 8.3.-10.3.2022

SYMPOSIUM “STEUERN & BILANZEN”

On 10th September 2021 the Business Taxation Group together with the Accounting, Taxation and Auditing Group and the Financial Accounting and Auditing Group hosted the 4th Symposium on Taxes & Financial Reporting. The half-day event was opened by Axel Dewitz, LL.M. Head of Taxes at Audi AG. He discussed the future requirements for the tax function of an multinational enterprise and the required competence profiles of employees in corporate tax departments. In doing so, he showed that in addition to tax expertise, process understanding and IT skills communication skills are becoming increasingly important.

Paul Brezina, MSc (Business Taxation Group) presented the results of an experimental study on the attitudes of taxpayers and tax auditors in relation to a prospective introduction of e-audits. Jennifer Wedl, MSc and Michael Deichsel, MSc (Accounting, Taxation and Auditing Group) discussed the accounting for and valuation of Crypto-Assets in the Austrian Commercial Code (UGB) and IFRS. Finally, Maria Sumerauer, MSc (Financial Accounting and Auditing Group) explained the interplay between good corporate governance and “good results” in the audit of financial statements.

ANNUAL MEETING OF THE BUSINESS TAXATION SECTION OF VHB

From 30th September to 1st October 2021 the Business Taxation Group hosted the annual meeting of the Business Taxation Section of the Association of University Teachers of Business Administration (VHB). The annual meeting serves the exchange of scientific ideas of the Business Taxation Chairs of German-speaking countries. In the Post-Doc and Juniorprofessor's workshop led by Prof. Petutschnig preceding the meeting Dr. Marcel Olbert (London Business School), Dr. Barbara Stage (WHU Vallendar) and Regina Ortmann, PhD (University of Paderborn) presented their current research projects. Discussants of the papers were Dr. Max Todtenhaupt (NHH Bergen), Prof. Dr. Philipp Dörrenberg (University of Mannheim) and Prof. Dr. Jochen Hundsdoerfer (FU Berlin). During the conference chaired by Prof. Eberhartinger presentations were given by Prof. Dr. Sabine Kanduth-Kristen (University of Klagenfurt), Prof. Dr. Jochen Hundsdoerfer (FU Berlin), Prof. Dr. Robert Ullmann (University of Augsburg), Prof. Dr. Martin Ruf (Eberhart Karls University of Tübingen) and Prof. Dr. Caren Sureth-Sloane (University of Paderborn). The event was rounded off by a panel discussion on the future of research data with Prof. Dr. Martin Fochmann (FU Berlin), Prof. Dr. Joachim Gassen (HU Berlin), Prof. Dr. Reinald Koch (University Eichstätt-Ingolstadt) and Prof. Dr. Michael Overesch (University of Cologne).



5TH VIENNA DOCTORAL CONSORTIUM IN TAXATION

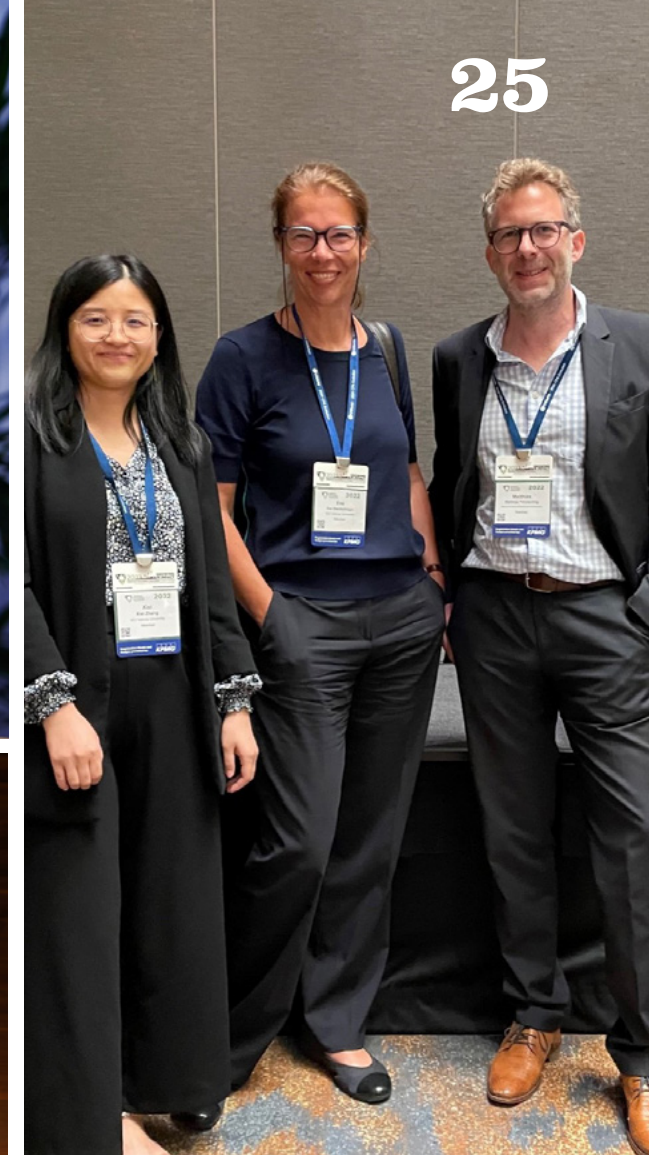
From 20th to 21st January 2022, the Business Taxation Group organized the 5th Vienna Doctoral Consortium in Taxation. During the two-day event, which aims to provide doctoral students with a forum for scientific exchange current research results of nine doctoral students from mainly European universities were discussed. The presentations were given by: Henning Giese, Arndt Weinrich (both University of Paderborn), Vincent Compagnie (IÉSEG Paris), Robert Vossebürger (WHU Vallendar), Eva Matthaai (FU Berlin), Stefan Weck, Alina Pfrang (both University of Mannheim), Ayse Sule Özdoğan and Xixi Zhang (both WU Vienna). As discussants of the papers volunteered: Prof. Dr. Reinald Koch (University Eichstätt-Ingolstadt), Prof. Dr. Robert Ullmann (University of Augsburg), Matthias Kasper, PhD (University of Vienna), Prof. Dr. Zoltán Novotny-Farkas, Prof. Dr. Matthias Petutschnig, Prof. Dr. Eva Eberhartinger, Mariana Sailer PhD (all WU Vienna), Prof. Dr. Jochen Hundsdoerfer (FU Berlin) and Prof. Dr. Inga Hardeck (University of Regensburg).

WU MATTERS. WU TALKS. GLOBAL MINIMUM TAXATION

On 4th May 2022 Matthias Petutschnig discussed with an expert panel formed by Dominik Bernhofer (Chamber of Labor Vienna), Iris Burgstaller (TPA), Ralf Kronberger (Austrian Chamber of Commerce) and Thomas Thomasberger (Siemens AG Austria) the introduction of a global minimum taxation. The different views on the global minimum tax and the expectations towards the new taxation regime were comprehensively discussed with the panel and the audience. The (German-language) event can be viewed using the following link: https://www.youtube.com/watch?v=5_rgYP2XSv

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 (mostly again in person). We were extremely pleased to host: Prof. Dr. Sarah Kröcher (Lancaster University), Prof. Dr. Eunhee Kim (University of Hong Kong), Prof. Dr. Ferdinand Elfers (Erasmus University Rotterdam), Prof. Dr. Jochen Hundsdoerfer (FU Berlin), Dr. Christoph Eendenich (ESSEC Business School), Prof. Pete Lisowsky (Boston University), Prof. Jordan Schoenfeld (University of Utah).



Information and contact

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