



Institute for Austrian and
International Tax Law **Vienna**
WU Transfer Pricing Center



Advanced Transfer Pricing Course (General Topics) April 15-19, 2024

Program

MONDAY, APRIL 15, 2024

INTRODUCTION TO TRANSFER PRICING

ACCURATE DELINEATION AND RECOGNITION OF THE ACTUAL TRANSACTION

08.45-09.00	Welcome and Introduction <i>Raffaele Petruzzi</i>
09.00-10.30	Introduction to Transfer Pricing <i>Raffaele Petruzzi</i>
10.30-11.00	Break
11.00-12.30	Workshop <i>Raffaele Petruzzi</i>
12.30-13.30	Lunch break
13.30-15.00	Accurate Delineation and Recognition of the Actual Transaction <i>Giammarco Cottani</i>
15.00-15.30	Break
15.30-17.00	Workshop <i>Giammarco Cottani</i>
18.00	Welcome dinner



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TUESDAY, APRIL 16, 2024

SELECTION AND APPLICATION OF TRANSFER PRICING METHODS

09.00-10.30	Traditional Transaction Methods <i>Axel Eigelshoven</i>
10.30-11.00	Break
11.00-12.30	Workshop <i>Axel Eigelshoven</i>
12.30-13.30	Lunch break
13.30-15.00	Transactional Profit Methods <i>Sayee Prasanna</i>
15.00-15.30	Break
15.30-17.00	Workshop <i>Sayee Prasanna</i>
17.00-17.15	Vienna Certificate in Transfer Pricing: Introduction and Q&A <i>Raffaele Petruzzi, Marcelo H.B. Moura</i>

WEDNESDAY, APRIL 17, 2024

TRANSFER PRICING AUDITS

TRANSFER PRICING RISK MANAGEMENT AND COMPLIANCE

09.00-10.30	Transfer Pricing Audits <i>Ágata Uceda</i>
10.30-11.00	Break
11.00-12.30	Workshop <i>Ágata Uceda</i>



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12.30-13.30	Lunch break
13.30-15.00	Transfer Pricing Risk Management and Compliance <i>Sven Bremer</i>
15.00-15.30	Break
15.30-17.00	Workshop <i>Sven Bremer</i>

THURSDAY, APRIL 18, 2024

MINIMIZING AND RESOLVING TRANSFER PRICING DISPUTES RESOLVING TRANSFER PRICING DISPUTES

09.00-10.30	Minimizing Transfer Pricing Disputes <i>Ryan McMahon</i>
10.30-11.00	Break
11.00-12.30	Workshop <i>Ryan McMahon</i>
12.30-13.30	Lunch break
13.30-15.00	Resolving Transfer Pricing Disputes <i>Sandra Knaepen</i>
15.00-15.30	Break
15.30-17.00	Workshop <i>Sandra Knaepen</i>



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FRIDAY, APRIL 19, 2024

TRANSFER PRICING IN SPECIFIC GEOGRAPHIC AREAS

ATTRIBUTION OF PROFITS TO PERMANENT ESTABLISHMENTS

09.00-10.30	Transfer Pricing in the OECD area <i>Melinda Brown</i>
10.30-11.00	Break
11.00-12.30	Transfer Pricing in Developing Countries and Emerging Economies <i>Melinda Brown</i>
12.30-13.30	Lunch break
13.30-15.00	Attribution of Profits to PEs <i>Raphael Holzinger</i>
15.00-15.30	Break
15.30-17.00	Workshop <i>Raphael Holzinger</i>