

Global Transfer Pricing Conference Transfer Pricing Developments around the World 2018

WU
WIRTSCHAFTS
UNIVERSITÄT
WIEN VIENNA
UNIVERSITY OF
ECONOMICS
AND BUSINESS

February 7-9, 2018 • Vienna (Austria)



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

Content and Structure

WEDNESDAY, FEBRUARY 7, 2018

- 14.00 - 16.00 **WU Transfer Pricing Workshop:
Exploring the Potential of Blockchain Technologies**
- 17.00 - 18.15 **Fire Side Chat at the Institute library with William Morris and Jeffrey Owens**
- 18.30 - 21.00 **Cocktail Reception**

THURSDAY, FEBRUARY 8, 2018

DAY 1: TRANSFER PRICING DEVELOPMENTS IN SPECIFIC REGIONS

- 08.30 - 09.00 Registration
- 09.00 - 09.30 **Welcome Address**
- 09.30 - 11.00 **Session 1: Global Transfer Pricing Developments**
The year 2017 has witnessed considerable developments in transfer pricing around the world. The OECD, after publishing its new Transfer Pricing Guidelines, has kept working on the implementation of their outcomes, as well as on further guidance on new topics. The European Union and its Joint Transfer Pricing Forum have undertaken major work to align transfer pricing rules in Europe. In the United States some relevant court cases have been decided. Moreover, numerous developing countries and emerging economies have changed their transfer pricing practices. This session will provide an overview and analysis of major global developments in the transfer pricing area.
- 11.00 - 11.30 Coffee Break
- 11.30 - 13.00 **Session 2: Transfer Pricing Developments in the European Union**
The European Union and its Joint Transfer Pricing Forum are currently working on a number of transfer pricing topics with the main aim of aligning transfer pricing rules in Europe in the aftermath of the OECD BEPS project. The focus is placed on comparables, the profit split method, valuation techniques, cooperative compliance, dispute resolution, and CbCR. In addition, issues related to the state aid cases remain high on the EU's transfer pricing agenda. This session will analyze and discuss the EU transfer pricing developments.
- 13.00 - 14.30 Lunch Break
- 14.30 - 16.00 **Session 3: Transfer Pricing Developments in the United States**
The United States has recently witnessed some decisions from relevant court cases that will have a relevant impact on multinationals' transfer pricing practices. Moreover, the proposals for a corporate tax reform under the new administration will certainly influence the way the IRS as well as US companies deal with transfer pricing topics. This session will present and debate the recent transfer pricing developments in the US.
- 16.00 - 16.30 Coffee Break

16.30 - 18.00 **Session 4: Transfer Pricing Developments in Developing Countries and Emerging Economies**

Developing countries and emerging economies have introduced relevant changes in their transfer pricing legislations and practices, as a consequence of the international developments as well as the release of the 2017 UN Practical Manual on Transfer Pricing. However, lack of guidance and limited experience in dealing with these topics are still a relevant issue for many countries around the world. This session will analyze and discuss the transfer pricing developments in developing countries and emerging economies.

FRIDAY, FEBRUARY 9, 2018

DAY 2: RECENT DEVELOPMENTS ON SPECIFIC TOPICS

09.00 - 10.30 **Session 5: Recent Developments on Transfer Pricing Documentation and Country-by-Country Reporting**

Since the beginning of the BEPS project, appropriate reporting and documentation has been considered as one of the most powerful tools in the fight against international tax avoidance. This belief has brought significant changes to the already existing transfer pricing documentation standards and gave birth to the development of the Country-by-Country Reporting. This session will present the results of the first application of these standards in numerous countries around the world.

10.30 - 11.00 Coffee Break

11.00 - 12.30 **Session 6: Recent Developments on Comparability Analysis in Transfer Pricing**

Comparability analysis in transfer pricing frequently generates relevant discussions between taxpayers and tax administrations, particularly in those countries where performing such an analysis is still hindered by limited availability of comparable data. To suggest suitable solutions to this issue, organizations such as the Platform for Collaboration on Tax and the EU Joint Transfer Pricing Forum have generated relevant studies that now need to be tested in practice. This session will explore these topics and debate the potential improvements produced by these studies, as well as the necessary enhancements needed.

12.30 - 14.00 Lunch Break

14.00 - 15.30 **Session 7: Recent Developments on Transfer Pricing and Intra-Group Financing**

Transfer pricing topics related to intra-group financing still remain high on the agenda of many tax administrations, notwithstanding the lack of guidance provided so far by international organizations. In order to complete its guidance, the OECD is currently drafting a new document providing its view on related party financial transactions that should constitute a separate chapter of its Transfer Pricing Guidelines. This session will explore the proposals already developed in this area and present further ideas for improvements to the new rules and guidelines.

15.30 - 16.00 Coffee Break

16.00 - 17.30 **Session 8: Recent Developments on the Profit Split Method**

The profit split method has been gaining increasing interest in the recent years. The OECD has worked for many years to develop guidance clarifying the implementation and application of this important transfer pricing method. This guidance is currently under review and can potentially change numerous practical aspects. This session will analyze this newly released guidance and debate issues and solutions for future improvements.

17.30 - 17.40 **Conclusive Remarks**

Speakers

PROF. KRISTER ANDERSSON (Sweden)

Member, **European Economic and Social Committee (EESC)**
Chair Tax Policy Group, **BUSINESSEUROPE**
Vice Chair, Tax Committee, **BIAC (Business and Industry Advisory Committee to the OECD)**

TOMAS BALCO (Slovakia/France)

Head of Transfer Pricing Unit, Centre for Tax Policy and Administration, **OECD**

MUKESH BUTANI (India)

Transfer Pricing Leader, Managing Partner, **BMR Legal**

MELINDA BROWN (Australia/France)

Senior Transfer Pricing Advisor, Centre for Tax Policy and Administration, **OECD**
Member, UN Subcommittee on Transfer Pricing, **United Nations**

TONY CLARK (United Kingdom/France)

Transfer Pricing Advisor, Centre for Tax Policy and Administration, **OECD**

DR. GIAMMARCO COTTANI (Italy)

Head of Transfer Pricing, **Ludovici Piccone & Partners**
Former Member, UN Subcommittee on Transfer Pricing, **United Nations**

STEFAN DE BAETS (Belgium)

Senior Counsel, **PwC Business Advisory Services CBVBA**
Former Senior Transfer Pricing Advisor, **OECD**

GIANNI DE ROBERTIS (Italy)

Chief Economist and EMA Regional Transfer Pricing Leader, **KPMG**
Non-Government Member, **EU Joint Transfer Pricing Forum**

MARLIES DE RUITER (The Netherlands)

Partner, Global ITS Tax Policy Leader, **EY**
Former Head of the Tax Treaty, Transfer Pricing and Financial Transactions Division, Centre for Tax Policy and Administration, **OECD**

KOMAL DHALL (United States)

Global Transfer Pricing Leader, **KPMG**

AXEL EIGELSHOVEN (Germany)

Partner, German Transfer Pricing Leader, **PwC**

HARTMUT FOERSTER (Germany)

Former Seconded National Expert, DG Taxation and Customs Union, **EU Commission**

BRUNO GIBERT (France)

Attorney at Law, Partner, **CMS Bureau Francis Lefebvre**
Chair, **EU Joint Transfer Pricing Forum**

ROBERTH GLANSBERG (Sweden)

Transfer Pricing Specialist, **Swedish Tax Agency**

SÉBASTIEN GONNET (France)

Vice President Global Transfer Pricing, **Nera Economic Consulting**
Non-Government Member, **EU Joint Transfer Pricing Forum**

DR. STEFAN GREIL (Germany)

Executive Officer, Division on Double Taxation Agreements and Transfer Pricing, **Federal Ministry of Finance**

DANNY HOUBEN (The Netherlands)

Tax Director, Netherlands, Belgium and Luxembourg, **Shell**

PROF. CHRISTIAN KAESER (Germany)

Corporate Vice President and Global Head of Tax, **Siemens**
Chair, **ICC Commission on Taxation**
Honorary Professor of Tax Law, **WU**

PHILIPP KAISER (Germany)

Head of Transfer Pricing, **Bayer**
Non-Government Member, **EU Joint Transfer Pricing Forum**

PAOLO LUDOVICI (Italy)

Managing Partner, **Ludovici Piccone & Partners**

MICHAEL MCDONALD (United States)

Executive Director, Transfer Pricing Services - International Tax Services, **EY**
Former Financial Economist, Office of Tax Analysis, **U.S. Department of the Treasury**
Former Chair, Working Party 6 (Taxation of Multinational Enterprises), Committee on
Fiscal Affairs, **OECD**

CLEMENT OKELLO MIGAI (Kenya/Austria)

Research and Teaching Associate, **WU**
Former Office of the Commissioner General, **Kenya Revenue Authority**

DR. JÉRÔME MONSENEGO (France/Sweden)

Associate Professor of International Tax Law, **Stockholm University**

WILLIAM MORRIS (United States)

Deputy Global Tax Policy Leader, **PwC**
Chair, Tax Committee, **BIAC (Business and Industry Advisory Committee to the OECD)**

PROF. JEFFREY OWENS (United Kingdom/France)

Director, Global Tax Policy Center, **WU**
Former Director, Centre for Tax Policy and Administration, **OECD**
Senior Tax Policy Advisor, **EY**

DR. RAFFAELE PETRUZZI (Italy/Austria)

Managing Director, WU Transfer Pricing Center, **WU**
Transfer Pricing Advisor, **Deloitte**

PROF. ROBERT RISSE (Germany)

Corporate Vice President and Head of Finance Tax & Trade Group, **Henkel**
Honorary Professor of Tax Compliance and Planning, **Leipzig University**

ANTONIO RUSSO (The Netherlands)

Partner, Chair EMEA Tax, **Baker McKenzie**

CARLOS PEREZ GOMEZ SERRANO (Mexico)

Director of Transfer Pricing, **Mexican Tax Administration**

SAM SIM (Singapore)

Regional VP (Europe, Mid-East, Africa, Latin America, Asia), **Tax Executive Institute**

STIG SOLLUND (Norway)

Director General International Tax, Tax Law Department, **Norwegian Ministry of Finance**
Former Chair, UN Subcommittee on Transfer Pricing, **United Nations**

SANFORD W. STARK (United States)

Partner, **Morgan, Lewis & Bockius**

DR. RICHARD STERN (United States/Austria)

Lead Tax Specialist, Global Tax Team, **The World Bank Group**

PROF. ALFRED STORCK (Switzerland)

Managing Director, WU Transfer Pricing Center, **WU**
Professor of International Taxation and Transfer Pricing, **WU**

DAVID SWENSON (United States)

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OLIVER WEHNERT (Germany)

Partner, GSA International Tax & Transfer Pricing Leader, **EY**

GRAEME WOOD (United Kingdom/United States)

Director, Global Taxes – Transfer Pricing, **Procter & Gamble**

SING YUAN YONG (Singapore)*

Tax Director, Tax Policy and International Tax Division, **Inland Revenue Authority of Singapore**

DR. JAMES (YIMIN) ZHAO (China)

Partner, Transfer Pricing, **Deloitte**

FLORIAN ZIRNSTEIN (Germany)

Transfer Pricing Manager, **Bayer**

*pending final confirmation



Organisation

PARTICIPATION FEE

The participation fee is **EUR 1,200.-**

This includes all conference materials, lunches, coffee breaks and refreshments. Costs of travel and accommodation are not included.

A **20% "early bird discount"** is applicable to applications sent by **November 15, 2017**.

A **full waiver** on the registration fee is granted to applications from full-time academics.

PAYMENT

You will receive an invoice for the participation fee of EUR 1,200.- (or of EUR 960.- in case of the "early bird discount"). We kindly ask you to transfer your payment within three weeks of the date of the invoice.

CANCELLATION

Any **notification of cancellation** of registration must be sent in writing to Christina Sudrat (christina.sudrat@wu.ac.at). In case of cancellation before January 8, 2018, the participation fee will be refunded. No refund can be made for cancellations received after January 8, 2018.

VENUE

WU (Vienna University of Economics and Business)

Welthandelsplatz 1

1020 Vienna, Austria

Cocktail Reception: Building D3, Second Floor, Tax Law Library

Conference: Ceremonial Hall 1, Building LC, Room LC.0.100

CONTACT DETAILS

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Registration form

I hereby submit my application for the **Global Transfer Pricing Conference**, held from **February 7-9, 2018** in Vienna (Austria).

Please write clearly using block letters and submit to: **christina.sudrat@wu.ac.at**
All fields marked with * are required.

First name* _____

Surname* _____

Academic Title (e.g. BA, MA, LL.M., Dr.) _____

Gender male female

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Current position and company / organisation* _____

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Information and Contact

For further information about the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law please visit:

[wu.ac.at/taxlaw/institute/wutpc/](https://www.wu.ac.at/taxlaw/institute/wutpc/)

[linkedin.com/company/wu-transfer-pricing-center](https://www.linkedin.com/company/wu-transfer-pricing-center)

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