

INVITATION

Conference

“CCCTB and Third Countries”

WU (Vienna University of Economics and Business), 1090 Wien, Augasse 2-6
January 30-31, 2012, Vienna, Austria

Organizer: Institute for Austrian and International Tax Law
(www.wu.ac.at/taxlaw)

Scientific Committee: Prof. Michael Lang, Prof. Pasquale Pistone, Prof. Josef Schuch,
Prof. Claus Staringer, Prof. Alfred Storck

Conference Venue: WU (Vienna University of Economics and Business)

At this conference, distinguished academics from all over the world will deal with the most important issues, which are raised by the draft directive of the CCCTB in respect of third countries.

We have identified nine topics on which papers will have been prepared. They will be introduced to the audience by keynote speakers. Their ideas will be commented briefly by discussants (experts from third countries, tax administrations of the Member states, EU etc).

The conference starts on **January 30, 2012** at 09:00. The working sessions will be held on January 30, 2012, and on January 31, 2012, at WU (Vienna University of Economics and Business). On January 30, 2012 the Mayor of Vienna will invite all participants to an evening at a “Heurigen”. The conference will end on January 31 at about 12:30.

The participation fee for the conference is EUR 1000.--. A waiver of the participation fee may be granted to professors and other researchers who are employed at a university or other academic institutions (wherever located) and have been engaged in research activities in International/European tax law. The participation fee must be paid not later than **December 30, 2011** and will not be refunded in the case of cancellation one week prior to the conference.

If you are interested, please send us the application form as soon as possible, stating whether you would like to register as a regular participant or apply for a waiver of the participation fee. Please send your applications via e-mail to **Renée Pestuka** (renee.pestuka@wu.ac.at)

Prof. Dr. Michael Lang

Head, Institute of
Austrian and International Tax Law
WU (Vienna University of Economics
and Business)

Prof. Dr. Claus Staringer

Professor at the Institute of
Austrian and International Tax Law
WU (Vienna University of Economics
and Business)

Prof. Dr. Alfred Storck

Professor at the Institute of
Austrian and International Tax Law
WU (Vienna University of Economics
and Business)

Prof. Dr. Josef Schuch

Professor at the Institute of
Austrian and International Tax Law
WU (Vienna University of Economics
and Business)

Prof. Dr. Pasquale Pistone

Professor at the Institute of
Austrian and International Tax Law
WU (Vienna University of Economics
and Business)

PROGRAMME

Conference
"CCCTB and Third Countries"

WU (Vienna University of Economics and Business)
January 30 and 31, 2012, Vienna, Austria

Monday, January 30, 2012

Session 1

09:00 – 10:00

Taxation of EU-Resident-Companies

Chair: *Claus Staringer*

Papers Prepared by: *Edoardo Traversa*
Charles-Albert Helleputte

Commentators: *Krister Andersson*
Katharina Becker

Session 2

10:00 – 11:00

Taxation of EU-Non-Resident-Companies

Chair: *Claus Staringer*

Paper Prepared by: *Eric Kemmeren*
Daniel Smit

Commentators: *Theo Keijzer*

11:00– 11:30

Coffee Break

Session 3

11:30 – 12:30

Resident and Non-Resident Taxpayers

Chair: *Michael Lang*

Paper Prepared by: *Guglielmo Maisto*
Claus Staringer

Commentators: *Lluís M. Fargas*
Ioanna Mitroyanni

12:30 – 14:00

Lunch Break

Session 4

14:00 – 15:00

Withholding Taxation

Chair: Josef Schuch

Paper Prepared by: Joachim Englisch
Commentators: Vieri Ceriani
Dennis Weber
Jan van de Streek

15:00 – 15:30

Coffee Break

Session 5

15:30 – 16:30

Transparent Entities

Chair: Pasquale Pistone/Jacques Sasseville

Paper Prepared by: Yariv Brauner
Commentators: Jörg Hernler
Christian Kaeser

Session 6

16:30 – 17:30

Deductibility of Gifts to Charitable Bodies in Third Countries

Chair: Pasquale Pistone

Paper Prepared by: Roman Seer
Commentators: Mitchell Kane

20:00

Evening at typical Austrian "Heurigen" (wine tavern)
on invitation of the Mayor of Vienna**Tuesday, January 31, 2012****Session 7**

09:00 – 10:00

Transfer of Assets to Third Countries

Chair: Michael Lang

Paper Prepared by: Daniel Gutmann
Commentators: Johann Muller
Steve Shay
Uwe Ihli

Session 8

10:00 – 11:00

Interest Deductibility

Chair: Michael Lang / Alfred Storck

Paper Prepared by: Pasquale Pistone
Commentators: Tom Neale
H. David Rosenbloom
Christoph Spengel

11:00– 11:30

Coffee Break

Session 9

11:30 – 12:30

CFC

Chair: Claus Staringer

Paper Prepared by: Christiana HJI Panayi
Commentators: Walter Hellerstein
Richard Lyal

Sessions will take place at the main building (UZA 1, Augasse 2-6, 1090 Vienna) of the WU (Vienna University of Economics and Business) in the ceremony hall ("Festsaal"), 1st floor.