

Advanced Transfer Pricing Course (Specific Topics)

WU
WIRTSCHAFTS
UNIVERSITÄT
WIEN VIENNA
UNIVERSITY OF
ECONOMICS
AND BUSINESS

September 21-25, 2020 • ONLINE COURSE



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

Course Overview

The increasing global trade and the role of multinational enterprises in the global economy have boosted the relevance of transfer pricing topics. The number of countries having transfer pricing legislation in place has increased from a mere four in 1994 to more than 100 in 2016. Therefore, transfer pricing is **one of the most relevant and challenging topics** in the international tax environment.

The **Advanced Transfer Pricing Course (General Topics)** offered by the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law meets the increasing demands for education in this field by offering high quality training. With renowned experts from all over the world as lecturers, training at the highest international level with a great degree of practical relevance is guaranteed.

The **Institute for Austrian and International Tax Law** (www.wu.ac.at/en/taxlaw), part of WU (Vienna University of Economics and Business), is among the largest academic institutions in the world carrying out research and teaching about tax law. Its main fields of activities are corporate tax law, international tax law, and European tax law. Staff also participate in numerous national and international tax projects and have developed an impressive network with contacts to over 90 countries over the years. The Institute's



staff currently comprises of 90 staff members, most of them academics, as well as many visiting professors and guest researchers from around the world.

The **WU Transfer Pricing Center** (www.wu.ac.at/taxlaw/institute/wutpc) at the Institute for Austrian and International Tax Law aims at researching, analysing, debating, and teaching transfer pricing topics. Through its activities, it positions itself as a global institution providing the missing nexus between theory and practice in approaching transfer pricing topics. The center combines both the academic and practical perspectives and its approach is highly international and interdisciplinary.



General Information

The course lasts five days and is held from **September 21-25, 2020**. This course is entirely held in **English** and will be available **online via live streaming**. A recording of the individual lectures will be made available for a period of ten days after the course. It is generally recommended to join the live stream whenever possible.

In order to guarantee a high degree of interactivity, the course is strictly limited to a **maximum of 30 participants**. Demand for the course generally is high and an early registration recommended.

The course is structured into four sessions per day of one to two hours each. Each topic is analyzed with a mix of theory and workshops (with case studies).

Target Group

The course is targeted at professionals around the world who want to broaden their knowledge of transfer pricing. Participants typically are **tax and transfer pricing advisors** (accountants, economists, and lawyers), **in-house tax and finance employees of international companies**, **government officials**, and **academics**.

Course Level

The course starts at an intermediate level. Therefore, it is suggested that participants have some experience in the field. No advance preparation is required.



Content and Structure

MONDAY, SEPTEMBER 21, 2020

TRANSFER PRICING AND INTRA-GROUP SERVICES

- 09.00-10.00 **Setting the Scene**
Raffaele Petruzzi
- 10.30-12.30 **The accurate delineation and recognition of the actual transaction**
Marco Orlandi
- 14.00-16.00 **The selection and application of transfer pricing methods**
Oliver Wehnert
- 16.30-18.00 **The implementation by MNEs**
Christian Runge

TUESDAY, SEPTEMBER 22, 2020

TRANSFER PRICING AND INTRA-GROUP FINANCING

- 09.00-10.00 **Setting the Scene**
Raffaele Petruzzi
- 10.30-12.30 **The accurate delineation and recognition of the actual transaction**
Michel van der Breggen
- 14.00-16.00 **The selection and application of transfer pricing methods**
Alejandro Zavala Rosas
- 16.30-18.00 **The implementation by MNEs**
Rani Peffer





WEDNESDAY, SEPTEMBER 23, 2020

TRANSFER PRICING AND INTANGIBLES

- 09.00-10.00 **Setting the Scene**
Raffaele Petruzzi
- 10.30-12.30 **The accurate delineation and recognition of the actual transaction**
Isabel Verlinden
- 14.00-16.00 **The selection and application of transfer pricing methods**
Emmanuel Llinares
- 16.30-18.00 **The implementation by MNEs**
Martin Lagarden and Robert Risse

THURSDAY, SEPTEMBER 24, 2020

TRANSFER PRICING AND BUSINESS RESTRUCTURINGS

- 09.00-10.00 **Setting the Scene**
Raffaele Petruzzi
- 10.30-12.30 **The accurate delineation and recognition of the actual transaction**
Monica Erasmus-Koen
- 14.00-16.00 **The selection and application of transfer pricing methods**
Brian Cody
- 16.30-18.00 **The implementation by MNEs**
Giammarco Cottani

FRIDAY, SEPTEMBER 25, 2020

TRANSFER PRICING, CUSTOMS AND VALUE ADDED TAX

- 09.00-11.00 **Transfer pricing and customs: setting the scene**
Ruud Tusveld
- 11.30-13.00 **Transfer pricing and customs: the implementation by MNEs**
Johannes Schimmer
- 14.00-16.00 **Transfer Pricing and Value Added Tax**
Eline Polak



Lecturers

Lecturers are **international leading transfer pricing experts** from academia, the business community, and advisory firms.



DR. RAFFAELE PETRUZZI

Managing Director, WU Transfer Pricing Center
Institute for Austrian and International Tax Law
WU (Vienna University of Economics and Business)

CEO, L&P Global; Of Counsel, Ludovici Piccone & Partners
Member, UN Subcommittee on Transfer Pricing



DR. BRIAN CODY

Principal, Economic and Valuation Services, Washington National Tax
KPMG



DR. GIAMMARCO COTTANI

Director, Global Tax Policy
Netflix



MONICA ERASMUS-KOEN

Partner Transfer Pricing
Taxtimbre



DR. MARTIN LAGARDEN

Head of Global Transfer Pricing
Henkel AG & Co. KGaA



DR. EMMANUEL LLINARES

Senior Vice President
NERA Economic Consulting



MARCO ORLANDI

Tax Consultant
Ludovici Piccone & Partners



RANI PEFFER

Group Manager, Global Tax/Global Treasury Capital Markets
Procter & Gamble



ELINE POLAK

Partner-Shareholder
Indirect Tax / VAT & Customs
Mazars



PROF. DR. ROBERT RISSE

Corporate Vice President and Head of Finance Tax & Trade Group
Henkel AG & Co. KGaA

Chairman of the Board, WU Transfer Pricing Center
Institute for Austrian and International Tax Law
WU (Vienna University of Economics and Business)



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Head of Transfer Pricing and Tax Technology
Shell International





JOHANNES SCHIMMER

Senior Director Tax – International Tax / Tax Planning
adidas



RUUD TUSVELD

Lecturer
University of Tilburg



MICHEL VAN DER BREGGEN

Partner, Transfer Pricing
PwC



ISABEL VERLINDEN

Partner
Global Transfer Pricing Leader
PwC



OLIVER WEHNERT

Partner
International Tax and Transaction Services - Transfer Pricing GSA ITTS Co-Leader
EY



ALEJANDRO ZAVALA ROSAS

Senior Economist
Baker McKenzie

Vienna Certificate in Transfer Pricing

This course is part of the **Vienna Certificate in Transfer Pricing**. The **certificate program** offers a unique opportunity to combine two excellent courses with a high-class case study as well as a technical paper supervised by the Managing Directors of the WU Transfer Pricing Center. Ideally, all four parts should be taken within one year. Previously completed courses can also be transferred to the certificate program.

The certificate is **targeted** at professionals around the world who want to build or broaden their knowledge in transfer pricing. Participants typically are tax and transfer pricing advisors (accountants, economists, and lawyers), in-house tax and finance employees of international companies, government officials, and academics.

The candidate will receive the “**Vienna Certificate in Transfer Pricing**” upon successful completion of the following four parts:

1. Advanced Transfer Pricing Course (General Topics)

This five-day course consists of an introduction to transfer pricing followed by lectures and workshops on the attribution of profits to permanent establishments, transfer pricing methods, administrative approaches to minimizing and resolving transfer pricing disputes, as well as transfer pricing risk management and compliance, among others.

2. Advanced Transfer Pricing Course (Specific Topics)

This five-day course deals with detailed lectures and intensive workshops on specific transfer pricing topics, such as transfer pricing and services, financing, intangibles, supply chain management and business restructurings, as well as indirect taxes and customs.

Lecturers from both courses are internationally renowned transfer pricing experts from academia, international organizations, the business community, government officials, and advisory firms.

3. Case Study

A case study should be solved by the candidate. This case study will be provided and supervised by the Managing Directors of the WU Transfer Pricing Center.

4. Paper

A paper, in the form of a technical article (8,000-10,000 words), should be prepared by the candidate in English. The topic of this paper will be agreed by the candidate together with the Managing Directors of the WU Transfer Pricing Center, who will supervise said article.

The **fee** to access the entire certified program amounts to EUR 8,250.00. Previously completed courses can be deducted from this amount and early bird discounts applied. For further information, please contact us on transferpricingcenter@wu.ac.at.

Participants of previous editions of our courses come from 64 different countries.



Registration form

I hereby submit my application for the **Advanced Transfer Pricing Course (Specific Topics)**
ONLINE - September 21-25, 2020

Please write clearly using block letters and submit to: **christina.sudrat@wu.ac.at**

First name _____

Surname _____

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

Gender male female

Nationality _____

Current position and company / organisation _____

E-Mail _____

Phone / Mobile* (for urgent issues) _____

WE WOULD LIKE TO STAY IN CONTACT

Please tick the boxes as appropriate:

I am happy for my personal details to be included in the **list of participants** which I understand will be distributed to all registered course participants:

- Yes (Name Email Country Affiliation)
 No

I consent to being informed about the activities of the WU Transfer Pricing Center / Institute for Austrian and International Tax Law (**e-mail newsletter/post**). For this purpose, I allow the Institute for Austrian and International Tax Law to file and process my data (name, address, e-mail address). I can revoke my consent at any time, whereby the legality of the data storage and processing on the basis of the prior consent until the point of the revocation is not affected. My revocation may be declared at any time in writing to the Institute for Austrian and International Tax Law or by e-mail to officetaxlaw@wu.ac.at.

- Yes (WU TPC Institute)
 No

BILLING ADDRESS

Please indicate the exact name and address to be shown on the invoice. You will receive the invoice by email only unless you specifically request a hard copy by post.

- I request a hard copy of my invoice to be sent by registered mail.
 I do not require a hard copy of my invoice; a PDF sent by email is sufficient.

Name / company _____

Street _____

Zip-Code, City _____

Country _____

Tax code / Reference _____

Date, Signature _____

PARTICIPATION FEE

The course fee is EUR 1,950.-

The course fee covers course participation and all course materials.

The course will be in English and entirely held online via live streaming. A recording of the individual lectures will be made available for a period of ten days after the course. It is generally recommended to join the live stream whenever possible.

PAYMENT

You will receive an invoice for the participation fee of EUR 1,950. 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. In case of cancellation before August 21, 2020 the participation fee will be refunded. No refund can be made for cancellations received after this date.

CONTACT DETAILS

WU Transfer Pricing Center at the Institute for Austrian and International Tax Law

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Information and Contact

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Getting there:
Underground: U2 Station Messe-Prater
or Krieau
Bus: 82A Stop Südportalstraße