

WU Transfer Pricing Center

at the Institute for
Austrian and International Tax Law

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AND BUSINESS



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

Scope and Aim of the Center

Transfer pricing is one of the most relevant and challenging topics in the international tax environment. Increasing global trade and the role of multinational enterprises in the global economy have boosted its relevance. The players currently interacting in this field are mainly international organizations, governments and tax administrations, the business community, and advisors. There is, however, an emerging need for the contribution of the academia to these topics, in order to facilitate the link between pragmatic solutions and theoretical principles. With this in mind, the Institute for Austrian and International Tax Law established the WU Transfer Pricing Center in 2015.

The **WU Transfer Pricing Center** researches, analyzes, discusses and teaches 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.

The Institute

The WU Transfer Pricing Center is an integral part of the **Institute for Austrian and International Tax Law** at WU (Vienna University of Economics and Business; www.wu.ac.at/en/taxlaw/).

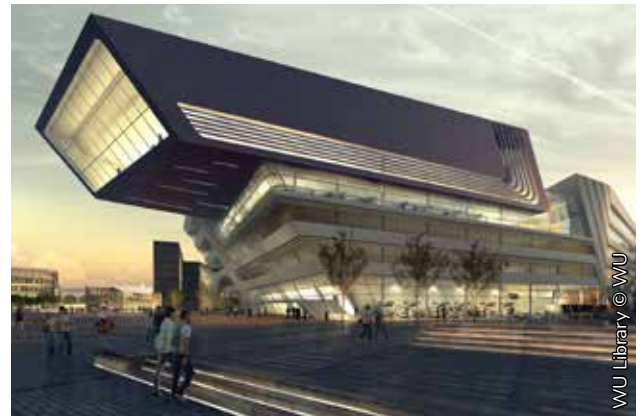
The Institute for Austrian and International Tax Law is one of the global leading tax academic institutions and it is extremely active in the field of international taxation. As well as research and teaching activities at the WU, its staff participates in numerous national and international tax projects and over the years has developed an impressive network of contacts in more than 90 countries. The team currently comprises of 90 staff members, most of them academics, as well as many visiting professors and guest researchers from around the world.





Research and Analysis

The WU Transfer Pricing Center **researches** and **analyses** transfer pricing topics. Within its activities, the Center publishes articles and books on transfer pricing topics, provides comments to the work of international organizations in this field, and much more. These activities involve all the transfer pricing community at the Institute for Austrian and International Tax Law (including professors, research associates, visiting researchers, LL.M. students) and outside the Institute (including, international organizations, governments and tax administrations, the business community, and advisors).



BOOKS ON TRANSFER PRICING TOPICS

- Lang, M., Cottani, G., Petruzzi, R., Storck, A. (eds.), *Fundamentals of Transfer Pricing: A Practical Guide* (Amsterdam: Wolters Kluwer, 2019).
- Petruzzi, R., Tavares, R.J.S. (eds.), *Transfer Pricing and Value Creation* (Vienna: Linde, 2019).
- Lang, M., Petruzzi, R., Storck, A. (eds.), *Transfer Pricing Developments Around The World 2019* (Amsterdam: Wolters Kluwer, 2019).
- Lang, M., Storck, A., Petruzzi, R., Risse, R. (eds.), *Transfer Pricing and Intangibles* (Vienna: Linde, 2019).

SELECTED ARTICLES AND CONTRIBUTIONS TO BOOKS ON TRANSFER PRICING TOPICS

- Petruzzi, R., Holzinger, R., Screpante M. S., Buriak, S., Capristano Cardoso, G. "The OECD "Unified Approach", *Transfer Pricing International* (2019), pp. 312-323
- Capristano Cardoso, G., Petruzzi, R., "Simplifying the Transfer Pricing Analysis: An Illusory Chimaera or a Realistic Ambition?", *World Tax Journal* 11 (4/2019), pp. 531-555.
- Miladinovic, A., Petruzzi, R., "The Recent Decisions of the European Commission on Fiscal State Aid: An Analysis from a Transfer Pricing Perspective", *International Transfer Pricing Journal* 26 (4/2019), pp. 243-252.
- Petruzzi, R., Holzinger, R., "Transfer Pricing, Financial Transactions and the Quest for Implicit Support", *Transfer Pricing International* (2019), pp. 193-200.
- Storck, A., "Transfer Pricing und Konzernfinanzierung: Praxishinweise für eine Arm's-Length-Compliance in einem zunehmend komplexen Thema", *Transfer Pricing International* (2019), pp. 149-155.
- Dziwiński, K., "Transfer Pricing and Intangibles: Report on the WU Transfer Pricing Symposium", *International Transfer Pricing Journal* 26 (3/2019), pp. 189-195.
- Buriak, S., Lazarov, I., "Between State Aid and the Fundamental Freedoms: The Arm's Length Principle and EU Law", *Common Market Law Review* 56 (4/2019), pp. 905-948.
- Navisotschnigg, F., "Transfer Pricing Adjustments and Re-Characterization – Lessons Learned from the Canadian Tax Court Case Cameco", *Transfer Pricing International* (2019), pp. 88-96.
- Prasanna, S., "Digitalization of Traditional Business Models: Transfer Pricing Implications of Business Restructurings", *International Transfer Pricing Journal* 25 (6/2018), pp. 424-435.
- Risse, R., "Digitization and the Tax Function in Multinational Enterprises", *Transfer Pricing International* (2018), pp. 308-310.

Debate

The WU Transfer Pricing Center **debates** transfer pricing topics. Within its activities, the Center organizes international conferences and regular events which bring together all the relevant global players in the transfer pricing area, coming from international organizations, governments and tax administrations, the business community, and advisors.



GLOBAL TRANSFER PRICING CONFERENCES & SYMPOSIA IN 2020/21

2020 Global Transfer Pricing Conference February 19-21, 2020

2020 WU Transfer Pricing Symposium October 30, 2020

2021 Global Transfer Pricing Conference February 17-19, 2021

WU TRANSFER PRICING WORKSHOPS IN 2020*

May 5, 6 & 7, 2020
September 21 & 24, 2020
October 29, 2020

Topics of previously held workshops include:

- The globalization of management functions and its tax effects
- Transfer pricing - Dispute prevention/ resolution instruments and alternative tools: the 'carrot and stick' approach?
- Dynamic Transfer Pricing - how to steer and to monitor in a digitalized world
- How to set Market Prices under Competition and Transfer Pricing Rules
- Disruptive profit allocation methods for disruptive businesses!?
- The Impact of Digitization on Supply Chains and Transfer Pricing
- How to apply the arm's length principle without comparables: a major challenge in emerging/ developing economies
- Risk Assumption und the Authorised OECD Approach and the 2017 OECD Transfer Pricing Guidelines: Similarities and Divergences
- Transfer Pricing and Beneficial Ownership
- Transfer Pricing aspects of Cash Pooling in evolution. International trends and lessons from court decisions

*Our workshops will focus on the latest relevant issues - therefore the exact topics will be decided upon closer to the date.

Teaching

The WU Transfer Pricing Center **disseminates knowledge** on transfer pricing topics. Within its activities, the Center organizes regular courses at different levels in order to train professionals from around the world who want to build on or broaden their knowledge of transfer pricing.

The following courses are organized annually:

- Advanced Transfer Pricing Course (General Topics)
- Advanced Transfer Pricing Course (Specific Topics)
- Advanced Transfer Pricing Course (Benchmarking)

COURSES IN 2020

Advanced Transfer Pricing Course (General Topics)
May 4-8, 2020

Advanced Transfer Pricing Course (Benchmarking)
July 6-10, 2020

Advanced Transfer Pricing Course (Specific Topics)
September 21-25, 2020

COURSES IN 2021

Advanced Transfer Pricing Course (General Topics)
May 3-7, 2021

Advanced Transfer Pricing Course (Benchmarking)
July 2021

Advanced Transfer Pricing Course (Specific Topics)
September 20-24, 2021



Vienna Certificate in Transfer Pricing

The “Vienna Certificate in Transfer Pricing” is a certificate program which 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 Director 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.

Participants are typically tax and transfer pricing advisors (accountants, economists, and lawyers), in-house tax and finance employees of international companies, government officials, and academics.

Other Activities



The WU Transfer Pricing Center develops **activities and projects** on transfer pricing topics which involve the Institute for Austrian and International Tax Law (and its WU Global Tax Policy Center), as well as other institutes at WU. The Center also cooperates with other academic institutions, Austrian research institutions, international organizations, governments and tax administrations, the business community, and advisors.

VISITING PROGRAMS

- WU Transfer Pricing Visiting Scholars Program
- WU Transfer Pricing Visiting Professionals Program

COOPERATION WITH THE WU GLOBAL TAX POLICY CENTER

- Blockchain and TP (DET)
- Tax Transparency and Corruption
- Cooperative Compliance
- Taxation and Technology
- Vienna Multistakeholder Group on Improving Cross-border Dispute Resolution

COOPERATION WITH THE TAX ACADEMY OF SINGAPORE

- WU-TA Specialised Transfer Pricing Programme
- SMU-TA Centre for Excellence in Taxation Annual Conference: Future of Tax - Reforms for Growth and Protection of Revenue Base



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Information and Contact

WU Transfer Pricing Center
at the Institute for Austrian and International Tax Law
WU (Vienna University of Economics and Business)
Welthandelsplatz 1, Building D3.2
1020 Vienna
Austria

E transferpricingcenter@wu.ac.at
T +43-1-313 36-5958
wu.ac.at/taxlaw/institute/wutpc/
[linkedin.com/company/wu-transfer-pricing-center](https://www.linkedin.com/company/wu-transfer-pricing-center)

WU (Vienna University of Economics and Business)
Institute for Austrian and International Tax Law
Welthandelsplatz 1, Building D3
1020 Vienna, Austria
wu.ac.at/en/taxlaw/

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