

WU Transfer Pricing Center

at the Institute for
Austrian and International Tax Law

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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

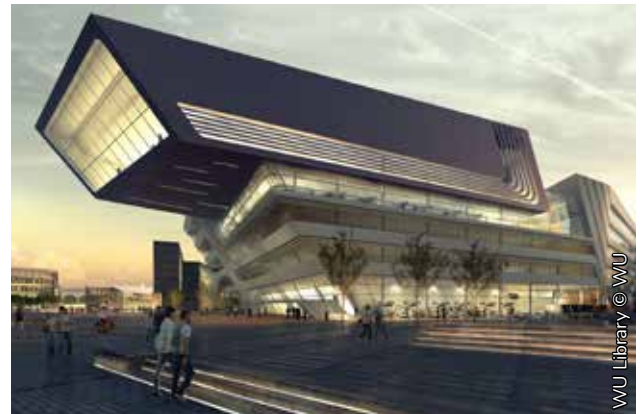
The WU Transfer Pricing Center is an integral part of the **Institute for Austrian and International Tax Law** at WU (Vienna University of Economics and Business; www.wu.ac.at/en/taxlaw/). The Institute for Austrian and International Tax Law is the largest institution of its kind worldwide. As well as being active in research and teaching activities at WU, the Institute is involved in many national and international research projects and therefore has an excellent worldwide reputation. Being the hub for the international tax community, the Institute offers a unique academic platform for significant, innovative and inspiring tax-related research.





Research

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).



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BOOKS ON TRANSFER PRICING TOPICS

- Lang, M., Petruzzi, R. (eds.), *Transfer Pricing Developments Around The World 2020* (Amsterdam: Wolters Kluwer, 2020).
- Lang, M., Storck, A., Petruzzi, R. (eds.), *Attribution of Profits to Permanent Establishments* (Vienna: Linde, 2020).
- 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).

SELECTED ARTICLES AND CONTRIBUTIONS TO BOOKS ON TRANSFER PRICING TOPICS

- Petruzzi, R., Holzinger, R., “Accurate Delineation vs Recognition of Intra-group Loans”, *Tax Notes International* (2020) (forthcoming).
- Petruzzi, R., “Dealing at Arm’s Length in Times of Social Distance: A Case Study”, *Tax Notes International* (2020), p. 1599.
- Prasanna, S., Capristano Cardoso, G., “Developing a Transfer Pricing Policy Framework for the Current Economic Crisis and Beyond”, *IBFD Journal Articles* 27 (5/2020).
- Buriak, S., “Transfer Pricing Developments around the World”, *International Transfer Pricing Journal* 27 (4/2020), pp. 1-10.
- Dziwiński, K., “Transfer Pricing and VAT”, *Transfer Pricing International* (2020), pp. 25-32.
- 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 Realistic Ambition?”, *World Tax Journal* 11 (4/2019), pp. 531-555.
- Petruzzi, R., Holzinger, R., “Transfer Pricing, Financial Transactions and the Quest for Implicit Support”, *Transfer Pricing International* (2019), pp. 193-200.
- 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.



WU TP Symposium 2019



Global TP Conference 2020



WU TP Workshop May 21, 2019

GLOBAL TRANSFER PRICING CONFERENCES & SYMPOSIA

2021 WU Global Transfer Pricing Conference
February 15-18 2021 - online

2021 WU Transfer Pricing Symposium
October 15, 2021

2022 WU Global Transfer Pricing Conference
February 16-18 2022

WU TRANSFER PRICING WORKSHOPS

Dates for 2021 to be announced on our website*

Topics of previously held workshops include:

- Managing transfer pricing controversy effectively
- TP Toolkit to master an economic crisis
- Determining arm's length ranges during economic downturns: challenges and possible solutions
- The Future of Corporate Tax: From Digital to Analog
- Dealing at arm's length in times of social distancing
- 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
- Transfer Pricing and Beneficial Ownership

*Our workshops will focus on the latest relevant issues - therefore the 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 2021

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

Advanced Transfer Pricing Course (Benchmarking)
July 5-9, 2021

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

COURSES IN 2022

Advanced Transfer Pricing Course (General Topics)
May 9-13, 2022

Advanced Transfer Pricing Course (Benchmarking)
July (tbc) 2022

Advanced Transfer Pricing Course (Specific Topics)
September 19-23, 2022



Benchmarking Course 2019



Specific Topics Course 2019

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 team 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 entities.

VISITING PROGRAMS

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

COOPERATION WITH THE WU GLOBAL TAX POLICY CENTER

- Tax and Good Governance
- Cooperative Compliance
- Tax and Technology
- Vienna Multi-Stakeholder Group on Improving Cross-border Dispute Resolution

COOPERATION WITH OTHER ENTITIES

The Center also cooperates with other academic institutions, research institutions, international organizations, governments and tax administrations, the business community, and advisors.



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Underground: U2 Station Messe-Prater or
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