Content and Structure

WEDNESDAY, FEBRUARY 19, 2020
18.30 - 21.00 Welcome Reception

THURSDAY, FEBRUARY 20, 2020
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 2019 has witnessed considerable developments in transfer pricing topics around the world. The OECD has kept working on the implementation of the 2017 Transfer Pricing Guidelines and its outcomes, as well as on solutions to the tax challenges of digitalisation of the economy. The European Union and its Joint Transfer Pricing Forum have undertaken major work on application of the transfer pricing methods in Europe, in particular with respect to the profit split method. In the United States, some relevant court cases have been decided. Moreover, numerous developing countries and emerging economies have developed 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 profit split method, comparables, valuation techniques, cooperative compliance, joint audits, dispute resolution, and CbCR. In addition, issues related to the state aid and fundamental freedoms cases remain high on the EU's transfer pricing agenda. This session will analyse 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 have recently witnessed some decisions of relevant court cases that might have an impact on multinational's transfer pricing practices. Moreover, since enactment of the Tax Cuts and Jobs Act, the US tax authorities continue to launch compliance campaigns focusing on transfer pricing and information reporting accuracy. 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 UN Practical Manual on Transfer Pricing in 2017. In 2021, the UN Practical Manual will be updated to further improve its usability and practical relevance, in specific by introducing new guidance on financial transactions and revision of the guidance on profit-split method, risk assessment and transfer pricing audits. However, limited experience in dealing with these topics are still a relevant issue for many countries around the world. Therefore, the OECD’s Task Force on Tax and Development has begun a programme of support for developing countries seeking to implement or strengthen their transfer pricing rules. This session will analyse and discuss the transfer pricing developments in developing countries and emerging economies.
19.30 Dinner
FRIDAY, FEBRUARY 21, 2020

DAY 2: RECENT DEVELOPMENTS ON SPECIFIC TOPICS

09.00 - 10.30  Session 5: Recent Developments on the Tax Challenges arising from the Digitalisation of the Economy (New Nexus Rules)
The development of effective solutions for taxation of highly-digitalized businesses is one of the priorities for the international tax society nowadays. Countries and international institutions are seeking solutions to amend the international tax environment, with specific focus on the taxation of highly-digitalized companies performing significant economic activities in a jurisdiction without a physical presence therein. The efforts are focused on the options to amend the current concept of permanent establishment and the profit allocation rules. In October 2019, the OECD suggested the concept of a new nexus in the context of its proposal for a Unified Approach under Pillar One. This session will evaluate and further discuss the recent proposal and suggestion for improving the currently proposed nexus rules.

10.30 - 11.00  Coffee Break

11.00 - 12.30  Session 6: Recent Developments on the Tax Challenges arising from the Digitalisation of the Economy (New Profit Allocation Rules)
The Unified Approach under Pillar One moved in a revolutionary direction concerning profit allocation. A three-tier system is suggested by the OECD, where on top of the conventional profit allocation in line with the Arm’s Length Principle, a formulary apportionment method would apply for attributing profits to market jurisdictions where “consumer-facing” businesses operate. This proposal, while in a simplistic way solving the issue on what profits the market states should be entitled to tax, raises substantial concerns on double taxation and misalignments of MNEs taxation with economic reality. This session will address all the strengths and weaknesses of the proposed profit allocation mechanism.

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 in the agenda of many tax administrations. In July 2018, the OECD has published a public discussion draft providing its view on related party financial transactions. In 2019, the UN Subcommittee on Transfer Pricing has contributed to these developments releasing a draft on financial transactions as a proposed update to the Practical Manual on Transfer Pricing for Developing Countries. This session will explore the proposals already developed in this area and present further ideas for improvements of the new rules and guidelines.

15.30 - 16.00  Coffee Break

16.00 - 17.30  Session 8: Recent Developments on the Use of New Technologies for Transfer Pricing Analyses
Increasing regulation has made transfer pricing topics increasingly complex for both taxpayers and tax administrations. In order to effectively manage a transfer pricing process, they should rely on technology solutions to ensure the compliance of related-party transactions with the arm’s length principle. This session will examine the technology landscape and what combination of technology can help MNEs and governments to reach more effective and timely levels of reporting accuracy.

17.30 - 17.40  Conclusive Remarks
Speakers

RAFFAELE PETRUZZI (Italy/Austria)
Managing Director, WU Transfer Pricing Center, WU
CEO, L&P Global; Of Counsel, Ludovici Piccone & Partners
Member, UN Subcommittee on Transfer Pricing

MATT ANDREW (France)*
Deputy Head of Division, Tax Treaty, Transfer Pricing & Financial Transactions Division, CTPA, OECD

RAJAT BANSAL (India)
Joint Secretary (Foreign Tax & Research II), Central Board of Dir. Taxes, Dept. of Rev., Min. of Finance
Member, UN Subcommittee on Transfer Pricing

TOMAS BALCO (France)*
Senior Adviser, BEPS Capacity Building Team, Global Relations & Developments Div., CTPA, OECD

MARKUS BAUR (Austria)
Transfer Pricing Director, IBM

STEWART BRANT (France)*
Head of Transfer Pricing Unit, Centre for Tax Policy and Administration, OECD

MUKEISH BUTANI (India)
Founder and Managing Partner, BMR Legal Advocates

LIZ CHIEN (United States)
Vice President of Global Tax, Ripple Labs

TONY CLARK (United Kingdom)
Transfer Pricing Advisor (Capacity Building Team), HM Revenue & Customs

GIAMMARCO COTTANI (Italy)
Director, Global Tax Policy, Netflix

MANUEL DE LOS SANTOS (France)*
Advisor, Transfer Pricing, Centre for Tax Policy and Administration, OECD

MARLIES DE RUITER (The Netherlands)
ITTS Partner, Global International Tax Services Policy Leader, EY

HARTMUT FÖRSTER (Germany)
Joint Audit Coordination, Federal Central Tax Office

BARBARA DOOLEY (Ireland)
Transfer Pricing Branch, International Tax Division, Office of the Revenue Commissioners

KARINE HALIMI-GUEZ (France/The Netherlands)
Managing Director Tax, FedEx

DMITRI JEGOROV (Estonia)
Deputy Secretary-General, Tax and Customs Policy, Ministry of Finance

CHRISTIAN KAESER (Germany)
Global Head of Tax, Corporate Finance Tax, Siemens
Honorary Professor, Institute for Austrian and International Tax Law, WU

DONATA KOREN (Poland/Germany)
Head of Tax, Zalando

MAX LIENEMEYER (Germany/Belgium)
Acting Head of Unit, DG Competition/ H5 – tax planning practices, European Commission

PAOLO LUDOVICI (Italy)
Founder and Partner, L&P Global - Ludovici Piccone & Partners

MARK R. MARTIN (United States)
Principal, Transfer Pricing Dispute Resolution, KPMG

*pending final confirmation / **pending IRA authorization
MICHAEL MCDONALD  (United States)  
Managing Director, Transfer Pricing Services - Int’l Tax and Transaction Services, EY  
Member, **UN Subcommittee on Transfer Pricing**

EMILY MUYAA  (Kenya/The Netherlands)  
Managing Principal for Sub-Saharan Africa, IBFD  
Member, **UN Subcommittee on Transfer Pricing**

WENDY NICHOLLS  (United Kingdom)  
Partner, Tax, Joint Global Head of Transfer Pricing, Grant Thornton UK  
Alternate Non-Government Member, **EU Joint Transfer Pricing Forum**

T.P. OSTWAL  (India)  
Senior Partner, T.P. Ostwal & Associates  
Member, **UN Subcommittee on Transfer Pricing**

JEFFREY OWENS  (United Kingdom/France)  
Director, Global Tax Policy Center, WU

AMANDA PLETZ  (United Kingdom)  
Associate Director, NERA Economic Consulting

SOPHIA REISMAN  (Austria)  
Global Transfer Pricing, OMV

ROBERT RISSE  (Germany)  
Corporate Vice President and Head of Finance Tax & Trade Group, Henkel  
Co-Chairman of the Board, WU Transfer Pricing Center, WU  
Honorary Professor of Tax Compliance and Planning, Leipzig University

ALEXANDER RUST  (Germany/Austria)  
Professor of Tax Law, WU

JOLANDA SCHENK  (The Netherlands)  
Global Business Tax Director NBD/Exploration/New Energies, Shell  
Member, **UN Subcommittee on Transfer Pricing**

JOSEF SCHUCH  (Austria)  
Professor of International Tax Law, WU

CAROLINE SILBERZTEIN  (France)  
Partner, Baker McKenzie  
Member, **UN Subcommittee on Transfer Pricing**

SAM SIM  (Singapore)  
Member, **Association of International Tax Judges**

STIG SOLLUND  (Norway)  
Director General, International Tax, Ministry of Finance  
Co-coordinator, **UN Subcommittee on Transfer Pricing**

CLAUS STARINGER  (Austria)  
Professor of Corporate Tax Law, WU

ALFRED STORCK  (Switzerland)  
Co-Chairman of the Board, WU Transfer Pricing Center, WU  
Professor of International Taxation and Transfer Pricing, WU

MARCOS VALADÃO  (Brazil)  
Tax Auditor, Receita Federal do Brasil, Ministry of Finance  
Professor of Tax Law, Catholic University of Brasilia  
Member, **UN Subcommittee on Transfer Pricing**

ISABEL VERLINDEN  (Belgium)  
Partner, Global Leader, PwC  
Non-Government Member, **EU Joint Transfer Pricing Forum**

INGELA WILLFORS  (Sweden)  
Director, Ministry of Finance  
Co-coordinator, **UN Subcommittee on Transfer Pricing**

GRAEUME WOOD  (United Kingdom/United States)  
Director, Global Taxes – Transfer Pricing, The Procter & Gamble Company

ZHANG YING  (China)  
Deputy Director, Anti-avoidance Division II, Int. Taxation Dept., State Taxation Administration  
Member, **UN Subcommittee on Transfer Pricing**
Registration

I hereby submit my application for the Global Transfer Pricing Conference on February 19-21, 2020 in Vienna (Austria).

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  □ 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

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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 December 15, 2019.
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 19, 2020, the participation fee will be refunded. No refund can be made for cancellations received after this date.

PHOTOS
We would like to inform you that this event will be photographed. Should you not wish to be photographed, we kindly ask you to avoid the camera and/or inform Ms. Christina Sudrat (christina.sudrat@wu.ac.at). Photos will be used to inform the public about the activities of the Institute.

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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Information and Contact

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wu.ac.at/taxlaw/institute/wutpc/
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Getting there:
Underground: U2 Station Messe-Prater or Krieau
Bus: 82A Stop Südportalstraße