

Global Transfer Pricing Conference
**Transfer Pricing
Developments around
the World 2019**



February 17-19, 2019 • Vienna (Austria)



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

Content and Structure

SUNDAY, FEBRUARY 17, 2019

18.30 - 21.00 **Welcome Reception**

MONDAY, FEBRUARY 18, 2019

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 2018 has witnessed considerable developments on transfer pricing around the world. The OECD has kept working on the implementation of the outcomes of the changes incorporated in the 2017 Transfer Pricing Guidelines, as well as on further guidance on new topics. The European Union and its Joint Transfer Pricing Forum have undertaken major work to align transfer pricing rules in Europe. In the United States, several court cases as well as the US tax reform have had a relevant impact on various transfer pricing issues. Moreover, numerous developing countries and emerging economies have changed their transfer pricing practices and the United Nations has been working on updating its 2017 Transfer Pricing Manual. 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 comparables, profit split method, valuation techniques, cooperative compliance, joint audits, dispute resolution, and CbCR. In addition, issues related to the state aid cases remain high on the EU's transfer pricing agenda. This session will analyze 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, the recent corporate tax reform will certainly have an impact on the way the IRS as well as US companies deal with transfer pricing topics. 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. However, lack of guidance and limited experience in dealing with these topics are still a relevant issue for many countries around the world. This session will analyze and discuss the transfer pricing developments in developing countries and emerging economies.



TUESDAY, FEBRUARY 19, 2019

DAY 2: RECENT DEVELOPMENTS ON SPECIFIC TOPICS

09.00 - 10.30 Session 5: Recent Developments on Transfer Pricing and Intra-Group Services

As part of its project to review the guidance on the Transfer Pricing Guidelines regarding intra-group service, the OECD has published in May 2018 an invitation for public comments on Scoping of the future revision of Chapter VII (intra-group services) of the Transfer Pricing Guidelines. This session will present the development of this project.

10.30 - 11.00 Coffee Break

11.00 - 12.30 Session 6: 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, notwithstanding the lack of guidance provided so far by international organizations. In order to compensate this missing guidance, the OECD has published a public discussion draft on July 2018 providing its view on related party financial transactions. This session will explore the proposals already developed in this area and present further ideas for improvements of the new rules and guidelines.

12.30 - 14.00 Lunch Break

14.00 - 15.30 Session 7: Recent Developments on the Nexus of Digital Permanent Establishments

The OECD has continued working on the guidance on Digital Economy following the BEPS project, publishing an interim report in March 2018. At the same time, the EU has released a series of proposals to deal with this topic, the “Fair and Effective Tax System in the EU for the Digital Single Market”, which includes a Directive proposal on a Digital Services Tax, a Directive proposal on the introduction of a digital permanent establishment concept and Recommendations to Member States to implement this concept in their double tax treaties. Moreover, the concept of digital permanent establishment has been discussed also by the UN and at country levels. This session will explore these proposals and debate its potential implications.

15.30 - 16.00 Coffee Break

16.00 - 17.30 Session 8: Recent Developments on the Attribution of Profits to Digital Permanent Establishments

After establishing the nexus for a digital permanent establishment, it is relevant to discuss which profits would be attributed to it. In March 2018, the OECD has published an Additional Guidance on the Attribution of Profits to Permanent Establishments. Moreover, the UN and the EU are also working towards finding a global solution, as individual countries seek taking measures at country levels. This session will analyze the developments on this topic and debate its implications for digital permanent establishments.

17.30 - 17.40 **Conclusive Remarks**

Speakers

DR. RAFFAELE PETRUZZI (Italy/Austria)

Managing Director, WU Transfer Pricing Center, WU
CEO, L&P Global
Member, UN Subcommittee on Transfer Pricing

PROF. ALFRED STORCK (Switzerland)

Co-Chairman of the Board, WU Transfer Pricing Center, WU
Professor of International Taxation and Transfer Pricing, WU

PROF. 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

JOSEPH L. ANDRUS (United States)

Member, UN Subcommittee on Transfer Pricing

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

DR. TOMAS BALCO (Slovakia/France)

Head of Transfer Pricing Unit, Centre for Tax Policy and Administration, OECD

LIZ CHIEN (United States)

Vice President of Global Tax, Ripple Labs

DR. GIAMMARCO COTTANI (Italy)

Head of Transfer Pricing, Ludovici Piccone & Partners

GIANNI DE ROBERTIS (Italy)

Chief Economist and EMA Regional Transfer Pricing Leader, KPMG
Non-Government Alternate Member, EU Joint Transfer Pricing Forum

MAURO FAGGION (Italy/Belgium)

Seconded National Expert, Direct Tax Policy & Cooperation, Directorate-General
for Taxation and Customs Union, European Commission

EVA FREHNER (Switzerland)

Director Corporate Tax, Vontobel

BRUNO GIBERT (France)

Attorney at Law, Partner, CMS Francis Lefebvre Avocats
Chair, EU Joint Transfer Pricing Forum

DR. STEFAN GREIL (Germany)

Division IV B 5 (Double Taxation Agreements, Transfer Pricing), Federal Ministry of Finance
Member, UN Subcommittee on Transfer Pricing

ANDREW HICKMAN (United Kingdom)

Independent Consultant
Member, UN Subcommittee on Transfer Pricing

LEE YING JOW (Singapore)

Director Transfer Pricing Services, EY
Senior Lecturer, Division of Business Law, College of Business, Nanyang Technological University

SOBHAN KAR (India)

Director (APA), Foreign Tax & Tax Research Div., Central Board of Direct Taxes, Ministry of Finance

ERIK KNIJNENBURG (Sweden)

Global Head of Tax and Transfer Pricing, H&M Hennes and Mauritz

PROF. HEINZ-KLAUS KROPPEN (Germany)

Partner Tax & Legal, PwC

PROF. MICHAEL LANG (Austria)

Vice Rector Human Resources, WU
Head of the Institute for Austrian and International Tax Law, WU
Professor of International Tax Law, WU

PROF. ADOLFO MARTÍN JIMÉNEZ (Spain)

Professor of Tax Law, University of Cádiz
Non-Government Member, EU Joint Transfer Pricing Forum

- PROF. GUNTER MAYR** (Austria)
Director General, Tax Policy & Tax Law, Ministry of Finance
Professor, Institute for Financial Law, University of Vienna
- MIKE MCDONALD** (United States)
Executive Director - Transfer Pricing Services, International Tax Service, EY
- DR. JUTTA MENNINGER** (Germany)
Freelancer, WTS
Non-Government Member, EU Joint Transfer Pricing Forum
- SYLVAIN MONTORO** (France)
Head of Finance & Tax, BlaBlaCar
- WILLIAM MORRIS** (United Kingdom/United States)
Deputy Global Tax Policy Leader, PwC
Chair, Tax Committee, BIAC (Business and Industry Advisory Committee to the OECD)
- GEORGE OBELL** (Kenya)
Head of International Tax Office, Kenya Revenue Authority
Member, UN Subcommittee on Transfer Pricing
- T.P. OSTWAL** (India)
Senior Partner, T.P. Ostwal & Associates LLP
Member, UN Subcommittee on Transfer Pricing
- PROF. JEFFREY OWENS** (United Kingdom/France)
Director of the Global Tax Policy Center, WU
Senior Tax Policy Advisor, EY
- PROF. PASQUALE PISTONE** (Italy/Austria)
Jean Monnet ad personam Professor of European Tax Law and Policy, WU
Academic Chairman, IBFD
- IRENE ROS** (The Netherlands)
Global Transfer Pricing Manager, Shell International
- PROF. JOSEF SCHUCH** (Austria)
Professor of International Tax Law, WU
- CAROLINE SILBERZTEIN** (France)
Partner, Baker & McKenzie
Member, UN Subcommittee on Transfer Pricing
- STIG SOLLUND** (Norway)
Director General International Tax, Tax Law Department, Ministry of Finance
Co-coordinator, UN Subcommittee on Transfer Pricing
- ROBERT STACK** (United States)
Managing Director, National Tax - International Tax Services, Deloitte
- PROF. CLAUDIUS STARINGER** (Austria)
Professor of Corporate Tax Law, WU
- MICHAEL STEINSALTZ** (United States)
International Tax Partner, Deloitte
- MICHEL VAN DER BREGGEN** (The Netherlands)
Partner, Transfer Pricing, PwC
- ELENA VEGELYTE** (Lithuania)
International Tax Manager, Vinted Group
- MARCIO VERDI** (Brazil/Panama)
Executive Secretary, Inter-American Center of Tax Administrations - CIAT
- ISABEL VERLINDEN** (Belgium)
Global Transfer Pricing Leader, PwC
Non-Government Member, EU Joint Transfer Pricing Forum
- DOMINIC VINES** (United Kingdom)
Team Leader (Financial Transfer Pricing), Delegated Competent Authority, HM Revenue & Customs
- OLIVER WEHNERT** (Germany)
Partner, GSA International Tax & Transfer Pricing Leader, International Tax Services, EY
- INGELA WILLFORS** (Sweden)
Director, Ministry of Finance
Co-coordinator, UN Subcommittee on Transfer Pricing
- GRAEME WOOD** (United Kingdom/United States)
Director, Global Taxes – Transfer Pricing, Procter & Gamble
- DR. JAMES (YIMIN) ZHAO** (China)
Partner, Transfer Pricing, Deloitte



Registration

I hereby submit my application for the Global Transfer Pricing Conference on February 17-19, 2019 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 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

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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.

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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 November 30, 2018.

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 18, 2019, 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

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

E transferpricingcenter@wu.ac.at

T +43-1-313 36-5958

Information and Contact

For further information about the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law please visit:

wu.ac.at/taxlaw/institute/wutpc/

[linkedin.com/company/wu-transfer-pricing-center](https://www.linkedin.com/company/wu-transfer-pricing-center)

or send an e-mail to:

transferpricingcenter@wu.ac.at

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

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