

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 Institute's team comprises of 60 academic staff members as well as many visiting professors and guest researchers from around the world.



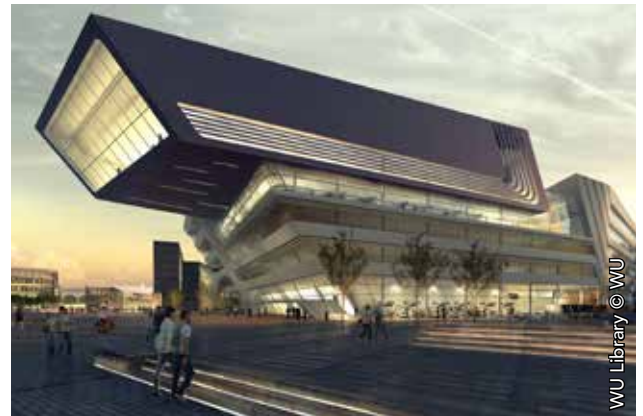
Staff of the Institute for Austrian and International Tax Law



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., Storck, A., Petruzzi, R. (eds.), *Transfer Pricing Developments Around The World 2018* (Amsterdam: Wolters Kluwer, 2018).
- Lang, M., Storck, A., Petruzzi, R. (eds.), *Transfer Pricing in a Post-BEPS World* (Amsterdam: Wolters Kluwer, 2016).
- Petruzzi, R., *Transfer Pricing Aspects of Intra-Group Financing* (Amsterdam: Wolters Kluwer, 2016).

SELECTED ARTICLES AND CONTRIBUTIONS TO BOOKS ON TRANSFER PRICING TOPICS

- Petruzzi, R., Buriak, S., "Addressing the Tax Challenges of the Digitalization of the Economy – A Possible Answer in the Proper Application of the Transfer Pricing Rules?", *Bulletin for International Taxation* 72 (4a/2018).
- Storck, A., Petruzzi, R., Prasanna, S., Dziwinski, K., "Global Transfer Pricing Conference 2018: Transfer Pricing Developments around the World", *International Transfer Pricing Journal* 25 (3/2018), pp. 217-224.
- Lahodny, A., Petruzzi, R., "Austria", in: IFA, *The Future of Transfer Pricing* (IFA Cahiers, 2017), pp. 135-154.
- Petruzzi, R., Holzinger, R., "Attribution of Participations to Permanent Establishments", *Transfer Pricing International* (2018), pp. 109-125.
- Van Rompaey, P., "Transfer Pricing Audits in Belgium: Controversial Outcome?", *International Transfer Pricing Journal* 24 (6/2017), pp. 466-481.
- Jow, L.Y., Yong, S.Y., "Related Parties as Used in Transfer Pricing", *International Transfer Pricing Journal* 24 (6/2017), pp.440-460.
- Peng, C., "A Rethink of Location-Specific Advantages with an Analysis of the Chinese Approach", *International Transfer Pricing Journal* 24 (6/2017), pp. 482-501.
- Storck, A., Prasanna, S., "Indian Tribunal Decision on Google: AdWords Program Constituting Royalty Income", *Transfer Pricing International* (2017), pp. 315-320.
- Tavares, R.J.S., "The Arm's Length Principle: Past, Present and Future", *Estudios de Derecho Tributario* 41 (2/2017), pp. 295-333.
- Storck, A., Miladinovic, A., "US Tax Court Ruled in Favour of Amazon US Addressing a Cost-Sharing Arrangement and the Related Transfer of Intangible Assets", *Transfer Pricing International* (2017), pp. 260-267.

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 2018/19

**2018 WU Transfer Pricing Symposium
Transfer Pricing and Intangibles: Current
Developments, Relevant Issues and Possible
Solutions**

October 29, 2018

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

February 17-19, 2019

2019 WU Transfer Pricing Symposium

October 14, 2019

WU TRANSFER PRICING WORKSHOPS IN 2018/19*

September 17 & 18, 2018

May 23, 2019

July 3 & 4, 2019

Topics of previously held workshops include:

- 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 aspects of Cash Pooling in evolution. International trends and lessons from court decisions
- Transfer Pricing in the Asset Management Industry
- Exploring the Potential of Blockchain Technologies
- Transfer Pricing and Intra-Group Financial Guarantees
- Alignment of Business Models and Transfer Pricing Systems in a Post-BEPS Regulatory Environment
- One Transfer Pricing Approach and Multiple Transfer Pricing Guidance

*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 2019

Advanced Transfer Pricing Course (General Topics)
May 20-24, 2019

Advanced Transfer Pricing Course (Benchmarking)
July 1-5, 2019

Advanced Transfer Pricing Course (Specific Topics)
September 23-27, 2019

COURSES IN 2020

Advanced Transfer Pricing Course (General Topics)
May 2020

Advanced Transfer Pricing Course (Benchmarking)
July 2020

Advanced Transfer Pricing Course (Specific Topics)
September 2020



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/Co-chairmen 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

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

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

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