



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



Global Transfer Pricing Conference

February 7-9, 2018, Vienna

Transfer Pricing Developments around the World 2018

Draft Programme

WEDNESDAY, FEBRUARY 7, 2018

- 14.00 – 16.00 **WU Transfer Pricing Workshop: Exploring the Potential of Blockchain Technologies**
- 17.00 – 18.15 **Fire Side Chat at The Institute Library**
- 18.30 – 21.00 **Cocktail reception**

THURSDAY, FEBRUARY 8, 2018

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 with Special Reference to the Determination of Value in a Digitalised Economy**

Chair: *Jeffrey Owens (WU)*

Presentation: *Raffaele Petruzzi (WU)*

Panellists: *Tomas Balco (OECD), Christian Kaeser (Siemens/WU), Michael McDonald (EY), William Morris (PwC/BIAC), Stig Sollund (Norwegian Ministry of Finance), Richard Stern (EY), Mike Williams (HM Treasury)*

11.00 – 11.30 Coffee Break

11.30 – 13.00 **Session 2: Transfer Pricing Developments in the European Union**

Chairs: *Christian Kaeser (Siemens/WU), Robert Risse (Henkel)*

Presentation: *Isabel Verlinden (PwC)*

Panellists: *Krister Andersson (EESC/BUSINESSEUROPE/BIAC), Hartmut Foerster (German Federal Central Tax Office), Bruno Gibert (CMS Bureau Francis Levebvre/EU Joint Transfer Pricing Forum), Stefan Greil (German Federal Ministry of Finance), Philipp Kaiser (Bayer)*

13.00 – 14.30 Lunch Break

14.30 – 16.00 **Session 3: Transfer Pricing Developments in the United States**

Chairs: *Josef Schuch (WU), Alfred Storck (WU)*

Presentation: *Komal Dhall (KPMG)*

Panellists: *Michael McDonald (EY), David Swenson (PwC), Sanford W. Stark (Morgan, Lewis & Bockius), Graeme Wood (Procter & Gamble)*

16.00 – 16.30 Coffee Break

16.30 – 18.00 **Session 4: Transfer Pricing Developments in Developing Countries and Emerging Economies**

Chairs: *Raffaele Petruzzi (WU), Pasquale Pistone (WU)*

Presentation: *Giammarco Cottani (Ludovici, Piccone & Partners)*

Panellists: *Mukesh Butani (BMR Legal), Carlos Perez Gomez Serrano (Mexican Tax Administration), Stig Sollund (Norwegian Ministry of Finance), James (Yimin) Zhao (Deloitte)*

FRIDAY, FEBRUARY 9, 2018

DAY 2: RECENT DEVELOPMENTS ON SPECIFIC TOPICS

- 09.00 – 10.30 **Session 5: Recent Developments on Transfer Pricing Documentation and Country-by-Country Reporting**
- Chairs: *Heinz Jirousek (WU), Robert Risse (Henkel)*
Presentation: *Oliver Wehnert (EY)*
Panellists: *Roberth Glansberg (Swedish Tax Agency), Stefan Greil (German Federal Ministry of Finance), Danny Houben (Shell), Paolo Ludovici (Ludovici, Piccone & Partners)*
- 10.30 – 11.00 Coffee Break
- 11.00 – 12.30 **Session 6: Recent Developments on Comparability Analysis in Transfer Pricing**
- Chairs: *Raffaele Petruzzi (WU), Alexander Rust (WU)*
Presentation: *Stefaan De Baets (PwC)*
Panellists: *Melinda Brown (OECD), Marlies De Ruiter (EY), Hartmut Foerster (German Federal Central Tax Office), Jérôme Monsenego (Stockholm University), Sing Yuan Young (Inland Revenue Authority of Singapore)*
- 12.30 – 14.00 Lunch Break
- 14.00 – 15.30 **Session 7: Recent Developments on Transfer Pricing and Intra-Group Financing**
- Chairs: *Raffaele Petruzzi (WU), Alfred Storck (WU)*
Presentation: *Antonio Russo (Baker McKenzie)*
Panellists: *Tony Clark (OECD), Gianni De Robertis (KPMG), Marlies De Ruiter (EY), Florian Zirnstein (Bayer)*



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15.30 – 16.00 Coffee Break

16.00 – 17.30 **Session 8: Recent Developments on the Profit Split Method**

Chairs: *Robert Risse (Henkel), Alfred Storck (WU)*

Presentation: *Sébastien Gonnet (NERA Economic Consulting)*

Panellists: *Melinda Brown (OECD), Axel Eigelshoven (PwC), Sam Sim (Tax Executive Institute), Graeme Wood (Procter & Gamble)*

17.30 – 17.40 **Conclusive Remarks**

Raffaele Petruzzi (WU), Robert Risse (Henkel), Alfred Storck (WU)