



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



Global Transfer Pricing Conference

February 17-19, 2019, Vienna

Transfer Pricing Developments around the World 2019

Draft programme

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**

Michael Lang (WU), Jeffrey Owens (WU)

09.30 – 11.00 **Session 1: Global Transfer Pricing Developments**

Chair: *Jeffrey Owens (WU)*

Presentation: *Raffaele Petruzzi (WU)*

11.00 – 11.30 Coffee Break

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

Chairs: *Pasquale Pistone (WU), Alfred Storck (WU)*

Presentation: *Isabel Verlinden (PwC)*



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13.00 – 14.30 Lunch Break

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

Chairs: *Robert Risse (WU), Alfred Storck (WU)*
Presentation: *Michael Steinsaltz (Deloitte)*

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), Josef Schuch (WU)*
Presentation: *Andrew Hickman*

FRIDAY, 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**

Chairs: *Claus Staringer (WU), Alfred Storck (WU)*
Presentation: *Oliver Wehnert (EY)*

10.30 – 11.00 Coffee Break

11.00 – 12.30 **Session 6: Recent Developments on Transfer Pricing and Intra-Group Financing**

Chairs: *Raffaele Petruzzi (WU), Alfred Storck (WU)*
Presentation: *Gianni De Robertis (KPMG)*



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12.30 – 14.00 Lunch Break

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

Chairs: *Raffaele Petruzzi (WU), Robert Risse (WU)*
Presentation: *Adolfo Jiménez Martin (University of Cádiz)*

15.30 – 16.00 Coffee Break

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

Chairs: *Raffaele Petruzzi (WU), Robert Risse (WU)*
Presentation: *Giammarco Cottani (Ludovici Piccone & Partners)*

17.30 – 17.40 **Conclusive Remarks**

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