

2025 WU Global Transfer Pricing Conference

Transfer Pricing Developments
around the World



February 19-21, 2025 • Vienna



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

Content and Structure

WEDNESDAY, FEBRUARY 19, 2025

16.00 - 18.00 **Lecture: 10 Years WU Transfer Pricing Center**

18.30 - 21.00 **Welcome Reception**

THURSDAY, FEBRUARY 20, 2025

09.00 - 09.15 **Welcome Address**

09.15 - 11.00 **Session 1: Global Transfer Pricing Developments**

2024 witnessed substantial developments in the transfer pricing world. The UN Tax Committee proposed a new article on taxation of services which effectively eliminates the need for physical presence. The OECD continued its work on Amount B of Pillar One, offering guidance on its implementation. Additionally, there have been noteworthy changes in a number of countries' legislations. The Pillar Two Rules came into force in several jurisdictions. Brazil adopted the arm's length principle into its domestic law. The UK issued guidelines for transfer pricing compliance and Germany introduced changes to the transfer pricing rules governing intra-group financing. Courts in various jurisdictions shaped transfer pricing practices for tax administrations and taxpayers. This session will provide an overview of the global developments in 2024 and how these impact on policy and practice.

11.30 - 13.00 **Session 2: Transfer Pricing and Recent Case Law**

The amount of transfer pricing litigation continues to increase worldwide, even in countries where court cases are traditionally scarce. For instance, South Africa had its first transfer pricing case. In Europe, discussions around transfer pricing and State aid were re-opened by the CJEU's judgment in the Apple case. Many other countries have witnessed landmark transfer pricing case law in 2024 that are likely to shape the future of transfer pricing. This session will delve into the emerging trends in litigation and the impact of judicial decisions on transfer pricing.

14.30 - 16.00 **Session 3: Transfer Pricing and the Simplified and Streamlined Approach**

Transfer pricing has gained notoriety for complexity over the years. To simplify this complexity, after publishing a report on Amount B in February 2024, the OECD continued to provide guidance on the implementation of this new tool, including a model competent authority agreement. It is hoped that the implementation of Amount B will simplify transfer pricing for routine distribution activities in countries classified by the World Bank Group as low income, lower-middle income and upper middle income. This session will discuss the practicalities of implementing the simplified approach presented under Amount B.





16.30 - 18.00 **Session 4: Transfer Pricing and Global Mobility**

The COVID-19 pandemic accelerated the shift towards remote working in many industries. This has become the 'new normal' in some cases. With the evolving regulatory framework regarding remote work, transfer pricing issues continue to arise, stretching the definition of permanent establishments to include remote PE. This session will explore the challenges brought about by mobility of labor regarding transfer pricing and consider best practices that emerged from some countries and businesses.

19.30 **Heurigen Dinner**

FRIDAY, FEBRUARY 21, 2025

09.00 - 10.30 **Session 5: Transfer Pricing and Cooperative Compliance**

Given the cross-border nature of transfer pricing, international businesses of any size have to deal with multiple transfer pricing rules from different jurisdictions. Accordingly, in order to mitigate potential disputes, cooperative compliance mechanisms such as rulings, advance pricing agreements or horizontal monitoring have gained significantly in relevance. Likewise, the European Commission has already published guidelines for a pilot project on cooperative compliance within the EU, focusing specifically on transfer pricing risks for large multinational enterprises. In light of the challenging transfer pricing compliance issues, this session will discuss recent developments and proposed solutions.

11.00 - 12.30 **Session 6: Transfer Pricing and the Extractive Industry**

Enterprises operating in the extractive industry are globally engaged and provide a significant contribution to the economies of many developing countries. As the amount of corporate income taxes raised in the mining sector is generally based on the value of the commodity being traded, it is critically decisive that such transactions are valued correctly. However, determining an arm's length remuneration for raw materials can be challenging. Both the OECD and the United Nations are working on these challenges. Against this background, this session will embark on an in-depth exploration of how these issues can be dealt with.

14.00 - 15.30 **Session 7: Transfer Pricing and Intra-Group Losses**

Intra-group losses in a transfer pricing analysis may pose significant challenges for companies. In particular, the application of the arm's length principle, the maintenance of sufficient documentation, and the handling of functional analyses can be difficult when dealing with intra-group losses. The importance of intra-group losses in transfer pricing was also highlighted in some recent case law such as the Sudamericana, ST Dupont and Stora Enso cases. This session will highlight the importance of intra-group losses in transfer pricing and assess how transfer pricing risks can be mitigated when dealing with this topic.

16.00 - 17.30 **Session 8: Transfer Pricing and New Technologies**

Doubtlessly, artificial intelligence has already accessed several areas of tax law, and it is also reshaping transfer pricing solutions for taxpayers and tax administrations. This session will address the impact that new technological tools are having in shaping taxpayers' compliance as well as tax administrations' processes.

17.30 - 17.40 **Conclusive Remarks**

Speakers

RAFFAELE PETRUZZI (Italy/Austria)

Managing Director, WU Transfer Pricing Center, **WU Vienna**
Founder and CEO, **PETRUZZI Advisory**

ANDRE A CAMPO (Netherlands)

Head of Transfer Pricing, **Booking Holdings**

REINHARD BIEBEL (Belgium)

Head of Unit Direct Tax Policy & Cooperation DG TAXUD, **European Commission**

MUKESH BUTANI (India)

Managing Partner, **BMR Legal**

GABRIELA CAPRISTANO CARDOSO (Brazil/France)

Tax Policy Adviser, Transfer Pricing Unit, **OECD**

LUIS CORONADO (Singapore)

Partner, **Ernst & Young Solutions**

GIAMMARCO COTTANI (Italy)

Founder - Managing Partner, **Vertice Global Tax & Legal**

RASMI RANJAN DAS (India)

Chief Commissioner of Income-Tax, Indian Revenue Service, **Government of India**

VERONIKA DAURER (Austria)

Deputy Head of Unit, **Federal Ministry of Finance**

SEBASTIAAN DE BUCK (Netherlands)

Global Head of Tax, **Unilever**

ALESSANDRO DENARO (Italy/Belgium)

EU Official, H5 Fiscal Aid and Aggressive Tax Planning, DG Competition, **European Commission**

IAN DYKES (United Kingdom)

Global Transfer Pricing Disputes Leader, **PwC**

MAURO FAGGION (Italy/Belgium)

Tax Policy Advisor, DG TAXUD, **European Commission**

LINDSEY FALKINGHAM (United States)

VP Global Transfer Pricing, **Procter & Gamble**

EDUARDO FLÖRING (Germany/Luxembourg)

Head of Transfer Pricing, **UTM Secs**

MATHEW OLUSANYA GBONJOBULA (Nigeria)

Coordinating Director, Compliance & Enforcement Group, **Federal Inland Revenue Service**

HANS GELUK (Netherlands)

Global Transfer Pricing Manager, **Danone**

CARLOS GONZÁLEZ GAMERO (Mexico)

Head of the International Taxation and the Transfer Pricing Units, Large Taxpayers Division,
SAT Servicio de Administración Tributaria

STEFAN GREIL (Germany)

Division IV B 3 (Transfer Pricing and Intergovernmental Proceedings), **Federal Ministry of Finance**

GEORG KOFLER (Austria)

Professor of Tax Law, **WU Vienna**

SAMI KOSKINEN (Finland)

Director, Stakeholder Relations, Customer Relations Unit, **Finnish Tax Administration**

DOMINIC KRENN (Austria)

Teaching and Research Associate, Institute for Austrian and International Tax Law, **WU Vienna**

MICHAEL LANG (Austria)

Head of the Institute for Austrian and International Tax Law, **WU**

BO DARLING LARSEN (Denmark)
Head of Office, Large Companies, Competent Authority, **Danish Tax Agency**

JONATHAN LEIGH-PEMBERTON (United Kingdom/Austria)
Cooperative Compliance Project Director, **WU Vienna**

DENNIS LUI (Singapore)
CEO, **Tax Academy of Singapore**
Deputy Commissioner, **Inland Revenue Authority of Singapore**

NOEL A. MAHER (Ireland/France)
Tax Policy Adviser, Transfer Pricing Unit, **OECD**

MICHAEL MCDONALD (United States)
Managing Director, Transfer Pricing Services - International Tax and Transaction Services, **Ernst & Young**

RUTH MIREMBE (Uganda/Austria)
Teaching and Research Associate, Institute for Austrian and International Tax Law, **WU Vienna**

WANDA MONTERO CUELLO (Dominican Republic/France)
Senior International Tax Specialist, **World Bank Group**

MARCO ORLANDI (Italy/Netherlands)
Transfer Pricing Lead UP/P&T/Serv, **Shell International**

ALISTAIR PEPPER (United Kingdom)
Managing Director, Economic and Valuation Service, Washington National Tax, **KPMG US**

KATARINA PETOVSKA (Slovakia/Austria)
Senior Manager, Global Transfer Pricing, **Dell Technologies**

CLAUDIA PIMENTEL (Brazil)
Undersecretary of Taxation and Litigation, **Receita Federal do Brasil**

MICHAEL POPP (Germany)
Head of Corporate Taxes Planning and Transfer Pricing, **Lufthansa Group**

ROBERT RISSE (Germany/Austria)
Director, WU Tax Law Technology Center, **WU Vienna**

ILKA RITTER (Germany/United States)
Tax Policy Advisor, **United Nations**

TOM ROESSER (United States)
GM, Tax Policy Counsel, **Microsoft Corporation**

MERJE ROOMET (Estonia)
Chief Expert of Tax Department, **Estonian Tax and Customs Board**

LUISA SCARCELLA (Italy)
Global Policy Lead - Taxation and Trade, **International Chamber of Commerce**

RITU SHARMA (United States)
Senior Director, Transfer Pricing and Tax Transformation, **Netflix**

DANIEL SMITH (United States)
Director, International Tax Planning & Policy, **Google**

GIACOMO SOLDANI (Italy/France)
Head of Tax, **EssilorLuxottica**

DAVID SPENCER (United Kingdom)
Head of International Tax, **AngloAmerican**

KAROLINE SPIES (Austria)
Professor of Tax Law, **WU Vienna**

ERIK STESSENS (Belgium)
Senior Vice President, **Mastercard**

RITA SZUDOCZKY (Hungary/Austria)
Associate Professor of Tax Law, **WU Vienna**

ISABEL VERLINDEN (Belgium)
Partner Corporate Tax Strategy - Transfer Pricing, **PwC**
University Lecturer

ELBA VIRTO (Spain/United Kingdom)
Transfer Pricing (APA & MAP) Team, UK Competent Authority, **HM Revenue & Customs**

INGELA WILLFORS (Sweden)
Director, Tax and Customs Department, **Ministry of Finance**



Registration



Please register on our website:

<https://short.wu.ac.at/xebu>



PARTICIPATION FEE

The participation fee for this event is **EUR 1,500.-**

A **10% "early bird discount"** is applicable to registrations sent **by December 9, 2024**.

A **waiver** on the registration fee can be granted to applications from researchers exclusively employed by an academic institution. To apply, please submit a short letter of motivation including the relevance for your research, together with your CV and a list of recent publications to transferpricingcenter@wu.ac.at.

The **participation fee** covers all materials, welcome reception, dinner, lunches, coffee breaks and refreshments. Costs of travel and accommodation are not included.

PAYMENT

You will receive an invoice for the participation fee of EUR 1,500.- (or of EUR 1,350.- in case of the "early bird discount"). We kindly ask you to transfer your payment within three weeks from the date of the invoice.

CANCELLATION

Any notification of cancellation of registration must be sent in writing to transferpricingcenter@wu.ac.at. In case of cancellation before February 5, 2025 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 for your image to be taken, we kindly ask you to avoid the camera and/or inform Ms. Isabel Huber (isabel.huber@wu.ac.at). Photos will be used to inform the public about the activities of the Institute for Austrian and International Tax Law.

VENUE

WU Vienna University of Economics and Business

Welthandelsplatz 1
1020 Vienna, Austria

Building LC

Ceremony Hall 2 (February 19) / Ceremony Hall 1 (February 20-21)

Information and Contact

WU Transfer Pricing Center
at the Institute for Austrian and International Tax Law
WU Vienna University of Economics and Business
Welthandelsplatz 1, Building D3.2
1020 Vienna
Austria

E transferpricingcenter@wu.ac.at
T +43-1-313 36-5813
www.wu.ac.at/taxlaw/institute/wutpc/
www.linkedin.com/company/wu-transfer-pricing-center



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