2024 Global Transfer Pricing Conference
Transfer Pricing Developments around the World
February 21-23, 2024

Program

WEDNESDAY, FEBRUARY 21, 2024

16.00 – 18.00 Introductory Lecture: Is the Control of Risk Framework Helping or Harming Transactional Comparability?
Andrew Hickman (Independent Expert)
Shauna Pittman (Department of Justice, Canada)

18.30 – 21.00 Welcome Reception

THURSDAY, FEBRUARY 22, 2024

08.30 – 09.00 Registration

09.00 – 09.15 Welcome Address
Michael Lang (WU)
Raffaele Petruzzi (WU)

09.15 – 11.00 Session 1: Global Transfer Pricing Developments
Chair:
Jeffrey Owens (WU)

Presentation:
Bence Péter Komár (WU)
Abhishek Padwalkar (WU)

Panel:
Reinhard Biebel (EU Commission)
Mayra Lucas (OECD)
Alan McLean (BIAC)
Ilka Ritter (UN)
Thomas Roesser (Microsoft Corporation)
Ying Zhang (State Taxation of Administration, China)
11.00 – 11.30 Coffee Break

11.30 – 13.00 **Session 2: Transfer Pricing and Amount B**
Chair: 
Raffaele Petruzzi (WU)

Presentation: 
Kirsty Rockall (Grant Thornton)

Panel: 
Stewart Brant (PwC)  
Gabriela Capristano Cardoso (OECD)  
Rasmi Ranjan Das (Government of India)  
Elizabeth Quiroz (Procter & Gamble)  
Daniel Smith (Google)

13.00 – 14.30 Lunch Break

14.30 – 16.00 **Session 3: Transfer Pricing and BEFIT**
Co-Chairs: 
Michael Lang (WU)  
Alexander Rust (WU)

Presentation: 
Isabel Verlinden

Panel: 
Paolo Valerio Barbantini (Italian Revenue Agency)  
Sebastiaan de Buck (Unilever)  
Mauro Faggion (EU Commission)  
Clive Jie-A-Joen (Erasmus University)

16.00 – 16.30 Coffee Break

16.30 – 18.00 **Session 4: The EC’s Transfer Pricing Directive**
Co-Chairs: 
Raffaele Petruzzi (WU)  
Rita Szudoczky (WU)

Presentation: 
Xaver Ditz (Flick Gocke Schaumburg)

Panel: 
Mauro Faggion (EU Commission)  
Alexander Hent (Deliveroo)  
Lara Janse (Ministry of Finance, Netherlands)  
Martin Lagarden (Henkel)

19.30 Heurigen Dinner
FRIDAY, FEBRUARY 23, 2024

09.00 – 10.30 **Session 5: Transfer Pricing and Blocked Income**
Chair: 
*Raffaele Petruzzi (WU)*

Presentation:
*Mark Martin (KPMG)*

Panel:
*Farid Hasnaoui (UN)*
*Philipp Kaiser (Bayer)*
*Margaret Kayser (HMRC)*
*Michael McDonald (EY)*

10.30 – 11.00 Coffee Break

11.00 – 12.30 **Session 6: Transfer Pricing and Profit Attribution to Permanent Establishments**
Co-Chairs: 
*René Matteotti (University of Zurich)*
*Raffaele Petruzzi (WU)*

Presentation:
*Seema Kejriwal (BMR Legal)*

Panel:
*Paula Acevedo (Chilean Tax Administration)*
*Giammarco Cottani (Agoda)*
*Mayra Lucas (OECD)*

12.30 – 14.00 Lunch Break

14.00 – 15.30 **Session 7: Transfer Pricing and ESG**
Co-Chairs: 
*Raffaele Petruzzi (WU)*
*Karoline Spies (WU)*

Presentation:
*Paolo Ludovici (Gatti Pavesi Bianchi Ludovici)*

Panel:
*Benoît Desirotte (Chanel)*
*Inge Willfors (Ministry of Finance, Sweden)*
*Giacomo Soldani (EssilorLuxottica)*

15.30 – 16.00 Coffee Break
16.00 – 17.30 **Session 8: Transfer Pricing and New Technologies**

Co-Chairs:
Raffaele Petruzzi (WU)
Richard Stern (EY)

Presentation:
Niklas Schwemin (greenfield Steuerberatungsgesellschaft)

Panel:
Renata Ardous (Chanel)
Eduardo Flöring (Unternehmensgruppe Theo Müller)

17.30 – 17.40 **Conclusive Remarks**

Raffaele Petruzzi (WU)