

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)

Ingela 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)