

Early booking bonus

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The Institute for Austrian and International Tax Law at WU
Vienna presents

The Practice of Double Tax Treaties in Case Studies – Senior level course

A three-day course for very experienced tax practitioners
June 26–28, 2025

PROGRAM

Thursday, June 26

Recent case law in different countries: interpretation and application of tax treaties

09.00 – 10.35 Recent case law on interpretation of tax treaties, relation between domestic law and tax treaty law, art. 3 para. 2 OECD model convention (**Beverungen, Lang**)

10.55 – 12.30 Recent case law on the role of the OECD model convention and the OECD commentaries in the interpretation of tax treaties (**Dziwiński**)

Recent case law in different countries: treaty entitlement and treaty abuse

14.00 – 15.35 Recent case law on tax treaty entitlement (**Padwalkar**)

15.55 – 17.30 Recent case law on the abuse of tax treaties (**Romstorfer**)

Friday, June 27

Recent case law in different countries: allocation rules

09.00 – 10.35 Recent case law on allocation rules – employment income, artists and sportsmen (**Kllokar**)

10.55 – 12.30 Recent case law on allocation rules – business profits, dealing at arm's length, permanent establishments, dividends, interest and royalties (**Weiss-Turcan**)

Recent case law in different countries: methods to avoid double taxation and non-discrimination

14.00 – 15.35 Recent case law on the methods to avoid double taxation (**Rao, Romstorfer**)

15.55 – 17.30 Recent case law on non-discrimination (**Hofstätter**)

Saturday, June 28

Recent OECD developments

- 09.00 – 10.35 The BEPS project of the OECD (**Jirousek**)
- 10.55 – 12.30 The BEPS update of the OECD Model Convention (**Jirousek**)
- 14.00 – 15.35 Recent OECD reports and discussion drafts (**Weiss-Turcan**)
- 15.55 – 17.30 Recent OECD developments in the area of transfer pricing (**Weiss-Turcan**)

Chairmen

Prof. Georg **Kofler**, Prof. Michael **Lang**, Prof. Alexander **Rust**, Prof. Josef **Schuch**,
Prof. Karoline **Spies**, Prof. Claus **Staringer**, Prof. Rita **Szudoczky**

Speakers

Juliane **Beverungen** (WU Vienna), Karol **Dziwiński** (Siemens Energy), Matthias **Hofstätter** (LeitnerLeitner, Vienna), Heinz **Jirousek** (WU Vienna), Martin **Klokar** (KLOKAR & PARTNER), Michael **Lang** (WU Vienna), Abhishek **Padwalkar** (WU Vienna), Siddesh **Rao** (Copenhagen Business School), Jürgen **Romstorfer** (WU Vienna), Laura **Weiss-Turcan** (SWARCO)

Organization

Fee

EUR 1.500 excl. 20% VAT, including course materials, coffee breaks and lunch
Early booking bonus: 10% when booking before April 22, 2025

Venue, contact details

Akademie der Steuerberater:innen und Wirtschaftsprüfer:innen GmbH
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<http://www.akademie-sw.at>, www.wu.ac.at/taxlaw

Registration

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Name/s:

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