

## Executive Program in Transfer Pricing: graduation of the 2<sup>nd</sup> edition and commencement of the 3<sup>rd</sup> edition

Since 2016, HEC Lausanne and the Faculty of Law, Criminal Justice and Public Administration of the University of Lausanne are offering an [Executive Program in Transfer Pricing \(EPTP\)](#). Transfer Pricing, which deals with the allocation of profits within Multinational Enterprises, is now a key area of concern for policy makers and the focus on important ongoing developments at the level of the OECD, the UN and the European Commission. The EPTP, which is academically linked to the [Tax Policy Center](#) of the University of Lausanne, aims at addressing the foregoing challenges and at contributing to the current policy debate. The program is aimed at in house tax experts, external tax consultants, policy makers and representatives of tax administrations

### Graduation of the 2<sup>nd</sup> edition and commencement of the 3<sup>rd</sup> edition

On April 19<sup>th</sup> 2018, the EPTP brought together two major events on the same day. The date indeed marked both the launch of the third edition of this program with 23 participants and the graduation ceremony of the 2<sup>nd</sup> edition with 22 participants. The participants, consisting inter alia of in house tax counsels of MNEs and tax consultants, originate from Switzerland but also from all around the globe.

### Opening lectures

The EPTP opened with special lectures given successfully by **Prof. Dr. Robert Danon** (Program Director), **Prof Dr. Guglielmo Maisto** (Maisto E Associati) and **Dr. Vikram Chand** (Program Executive Director) and **Mr. Valerio Barbantini** (former OECD delegate and now Deputy Director General of the Italian Revenue Agency). Professor Danon's lecture dealt with the: *"Evolution of transfer pricing policy and future challenges regarding the cross-border allocation of profits under the principle of value creation"*. Professor Maisto then addressed the problem of *"corresponding adjustments"* in transfer pricing as well as the impact of transfer pricing for other areas. Thereafter, Dr. Chand expanded on the BEPS objectives, in particular, on the three pillars of BEPS project in relation to *"coherence, substance & transparency and their relationship with transfer pricing and value creation rules"*. **Mr. Valerio Barbantini** finally presented the latest developments regarding *"transfer pricing methodology"*.

### Testimonials and publications in scientific journals

Piotr Drobniak: "EPTP is a great program for anyone who wants to acquire or expand its transfer pricing knowledge. It lays out theoretical foundation of transfer pricing with reference to OECD materials. This is then supported by practical examples and case studies. The course covers all key areas of transfer pricing and features high-caliber speakers from academia, advisory, government and industry. It is a truly international program involving experts from around the globe. It also provides a great opportunity to network and exchange experiences with the fellow students. It is this transfer pricing course that you should attend if you work in Tax in Switzerland".

Piotr's technical paper on *"Attribution of profits to commissionaires"* has already been published in the *International Transfer Pricing journal* of the IBFD.