

**WORKSHOP**

# **INTERCOMPANY SERVICES MANAGEMENT FEES AND BEYOND**



**APRIL 28th, 2021 4:30 - 6:30 p.m. CET**  
**Zoom Meeting**

## **INTRODUCTION and CHAIRMAN**

**Prof. Gianni Vivona** - Co-Director IBTC

## **SPEECHES**

**Dr. Emanuela Maria Santoro** - Regional Tax Director Coca-Cola Hellenic Bottling

*Management fees tax issues: domestic perspective vs OECD TP Guidelines*

**Prof. Andres Baez Moreno** - University Carlos III Madrid (Spain)

*Cross border taxation of (intra-group) services*

**Prof. Juan Jose Zornoza** - University Carlos III Madrid (Spain)

*Discussing intra-group services: waiting for the proposed review of Chapter VII of the Transfer Pricing Guidelines*

**Dr. Massimo Ferrari** - Head of Tax, Pirelli

**Dr. Dario Taglioretti** - Head of Tax, Prometeon

*Critical tax issues for the recharge of management fees by Italian parent company to foreign subsidiary*

**Prof. Luis Eduardo Schoueri** - University San Paulo (Brazil)

*Income qualification of inter-company technical services: Brazilian perspective vs OECD Double Tax Treaty Model Convention*

## **CONCLUSION**

**Prof. Marco Fazzini** - Co-Director IBTC

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