

Preface

The world is rapidly changing, and so is the business environment. To keep up with the pace, multinational enterprises (MNEs) need to continuously restructure their operations, assets, and resources. This can help them to adapt to the changing market conditions, improve operational efficiency, reduce costs, and optimize financial performance.

However, restructuring is a complex process, especially regarding transfer pricing (TP). Even after elaborate guidance provided by the OECD and the UN on the topic, the TP aspects of business restructuring remains a challenge both for MNEs and the tax administrations in determining the appropriate TP methodology, finding comparable transactions, and providing proper documentation to support the restructuring. The determination of the arm's length principle for transactions involving these can have significant tax implications for MNEs.

This book aims to provide a comprehensive understanding of the TP aspects of business restructuring by way of case studies. It attempts to cover various issues related to business restructuring, including delineation and recognition, remuneration of restructuring and post-restructuring, and other relevant issues such as exit taxes, location savings, permanent establishments, and implications of COVID-19.

This book is based on the outcomes of the presentations and discussions held during the WU Transfer Pricing Symposium “Transfer Pricing and Business Restructurings: Current Developments, Relevant Issues and Possible Solutions” that occurred in October 2022 at the WU Vienna University of Economics and Business. The symposium was organized by the WU Transfer Pricing Center at the Institute for Austrian and International Tax Law which is conducting research projects on various TP topics and their global impacts, including the application of TP rules to intra-group business restructuring. During the symposium, several renowned international experts presented their papers on various issues associated with TP aspects of business restructuring that were accompanied by practical case studies and followed by panel discussions; all are part of this book that also includes an introduction chapter.

Our goal is to equip readers with both an academic and practical approach to understanding the TP aspects of business restructuring. The book is intended for professionals, academics, and students who wish to enhance their knowledge and understanding of TP and business restructuring. The book provides an in-depth analysis of the topics described above and suggestions for potential future solutions to any issues that may arise. We hope that this book will serve as a useful reference guide for readers and help them to navigate the complex world of TP and business restructuring.

We would like to express our sincere appreciation to the authors of the chapters for taking time from their busy professional lives and committing to this project. Many thanks are forwarded to Linde Verlag GmbH for supporting and cooperating with this publication project. Last, but not least, the editors would like to thank *Christina Sudrat*, *Nina Klaus* and *Abhishek Padwalkar* for the overall supervision and *Jenny Hill* for providing linguistic support to the authors during the publishing process.

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