

News, Events & Publications

Dr. Stephan Schnorberger

Publications

- Co-Author, (with Rabea Lingier), "Germany - Chapter 7", The Transfer Pricing Law Review, Edition 4, August 2020
- Co-Author, (with Nils Etzig) "Verrechnungspreise in der Praxis nach dem ATAD-UmsG - Anmerkungen zum Referentenentwurf vom 24.3.2020", Betriebs-Berater, BB 30.2020, July 2020
- Co-author (with Rabea Lingier), "Transfer Pricing Germany," Update 2020, Baker McKenzie EMEA Transfer Pricing Handbook, July 2020
- Co-author, "Covid 19: Impact on (the Other) TP," Baker McKenzie Bloomberg Tax Special Report, April 2020
- Author, "Steuerrechtliche Aspekte grenzüberschreitender Vertragsgestaltung - Lektion 11", 3rd edition, FORUM Institut für Management GmbH, July 2020
- Co-author, "Changes in transfer pricing rules - 2020 Update", client alert Baker McKenzie, April 2020
- Co-author, "Numerous changes of German transfer pricing rules - March 2019 Update," client alert Baker McKenzie, March 2019
- Editorial, "Steuerplanung und Steuerpolitik im Post BEPS-Steuerwettbewerb," Betriebs-Berater 3.2019, January 2019
- Author, "Funktionsverlagerung und Veräußerung immaterieller Wirtschaftsgüter: Führen Sofortveräußerung und Lizenzierung zur selben Gewinnrealisierung?," Der Steuerberater, Edition 12, December 2018
- Author, "Komplex und dynamisch: Im Digitalisierungszeitalter mit den Änderungen im Steuerrecht Schritt halten", DStR, Karriere Special Tax, Edition 42/2018
- Author, "Transferring marketing authorizations as a result of Brexit: key tax considerations," Baker McKenzie' Insight, Lexology, September 2018
- Commenter, "EU directive raises uncertainty over tax avoidance reporting duty," in TP Week, May 15, 2018
- Author, "Tax Structuring Post BEPS", Best of the Best Expert Guides, April 2018
- Author, "Risk assessment and management in a fast changing environment; dashboards for VP Tax; communication to the Board," Post-Bloomberg BNA Conference Debrief, April 2018
- Author, "Steurgestaltung und Compliance im Zeitalter nach BEPS," Börsen-Zeitung, Edition 29, February 2018
- Co-author, "Sweeping changes of German transfer pricing rules - January 2018 Update," client alert Baker McKenzie

- Co-author, "Federal Council approves new law limiting royalty deductions," client alert Baker McKenzie
- Author, "BEPS führt zu einer Mehrbelastung," JUVE Steuermarkt, February 2017, p. 21-22
- Author, "Schöne neue Welt der internationalen Unternehmensbesteuerung?," Börsen-Zeitung, Edition 180, 17.9.2016
- Author, "Bilateral and Multilateral Tax Audits in Europe: Are Taxpayers Defenseless?," Tax Notes International, Volume 84, No. 7, November 2016
- Author, "A Broadening of the Case for Profit Split?," BBNA Global Transfer Pricing Conference, Paris, March 14/15, 2016
- Author, "Permanent Establishments – Germany," Update March 2016, IBFD Online Collection
- Author, "Germany's Highest Tax Court and the Fundamentals of Arm's-Length Analysis in a Treaty Context," BBNA Tax Management Transfer Pricing Report, Vol. 24, No. 6, July 23, 2015
- Author, "The Seven Deadly Sins of Post-Acquisition IP Transfers," BNA Tax Management Transfer Pricing Report, Vol. 23 No. 18, Jan. 22, 2015
- Author, "International Taxation of Permanent Establishments - Retro-active Implementation of the "Separate Entity Approach" from 2013 onwards, Bloomberg BNA Tax Planning International European Tax Service, Volume 15, Number 7, July 2013
- Author, "The OECD's Project to Define Intangibles: A Case for Adhering to Fundamental Principles," Tax Management Transfer Pricing Report, April 5, 2012, Vol. 20, No. 23
- Author, "Response to the Call for Public Consultation on the Draft Guidance Paper: Quantifying harm in actions for damages based on breaches of Article 101 or 102 of the TFEU;" Baker & McKenzie Comments to the EU Commission, Sept. 30, 2011
- Co-author, Baker & McKenzie "Comments on OECD WP6 Transfer Pricing Intangibles," August 1, 2011
- Stephan frequently writes articles and speaks at tax conferences.

Presentations

- Moderator, "Internationales Steuerrecht - Quellensteuer auf Lizenzen mit Inlandsbezug und Der Fremdvergleich bei der konzerninternen Finanzierung," 5. Frankfurter Steuerkongress, Deutscher Fachverlag, October 2020
- Moderator, "Internationales Steuerrecht - Jenseits des Fremdvergleichs und des AOA-Chaos oder höhere Ordnung?," 4. Frankfurter Steuerkongress, Deutscher Fachverlag, October 2019
- Panelist, "Dispute Resolution Options," Global Transfer Pricing Summit Versailles, June 2019
- Moderator, "Praxisfragen der Verrechnungspreisdokumentation," "Internationale Betriebsprüfungen," Verrechnungspreise in der Praxis, November 2018
- Moderator, "Internationales Steuerrecht - Steuerplanung und internationale Steuergestaltungen nach BEPS," 3. Frankfurter Steuerkongress, Deutscher Fachverlag, October 2018
- Moderator, "Transfer Pricing Controversy: Current court cases and controversy topics," EMEA Tax Dispute Resolution Conference, February 2018