Global Transfer Pricing Forum – Europe 2016

29 & 30 June, Hotel Adlon Kempinski, Berlin

Drawing on fifteen years of experience in the transfer pricing events space, as a delegate you can expect to:

- Benefit from a transparent debate on BEPS, the rise in TP disputes and what CbCr really means for taxpayers
- Engage in frank discussions with 30+ expert panellists where your contributions will remain confidential
- Network with 200+ high-level tax and transfer pricing executives from leading multinational organisations

Visit the website: www.bitly.com/EUTP2016

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Building on the unique and trusted publishing brands of TPWeek and International Tax Review, the Global Transfer Pricing Forum will bring multinational organisations together with leading advisers from law and accounting firms. As publishers with over 25 years’ experience in the TP space, the Forum will lead the debate on the present and future practical implications of the final BEPS recommendations for transfer pricing departments eight months since they were released.

The Forum is not intended as a traditional educational style seminar. The aim is to facilitate free and transparent debate on topics such as the meaning of value creation in the BEPS context, the rise in TP disputes and what revenue authorities can do now and in the future. As such, taxpayers are invited to openly share experiences of how to deal with a global transfer pricing environment that is changing rapidly.

Instead of traditional press reporting on the event, TPWeek and International Tax Review editors will lead the debate with their own probing questions for the expert panellists from industry and practice and will encourage delegates to challenge the speakers’ opinions.

Contributions will remain anonymous and confidential but themes that emerge – major concerns, and unanswered questions - will be presented in a report which will be seen by all subscribers to TP Week and ITR, including the OECD and major revenue authorities.

Current expert speakers at the Forum include:

- **Napoleão Dagnese**
  Senior Director, International Taxation, Lupin

- **Philippe Paumier**
  Associate Vice President, Global Head of Transfer Pricing, Sanofi

- **António Calisto Pato**
  Global Head of Tax, Chiquita International Brands

- **Yordan Nenkov**
  Group Head of Tax, Coface

- **Paul Morton**
  Head of Group Tax, RELX Group

- **Georg Gam-Jensen**
  Global Transfer Pricing Manager, LEGO Group

- **Brigitte Baumgartner**
  International Tax Manager, Plansee

- **Louis van Melsenn**
  Global Head of Tax, AMCo
08.30 Registration and breakfast

09.00 Chair’s introduction and opening remarks
Caroline Byrne, Managing Editor, TP Week and International Tax Review

09.10 Keynote address:
Christopher Wales, former UK Treasury and PwC Adviser

09.30 BEPS compliance overview
By the time this panel sits, it will have been almost one year since the final BEPS guidelines were released. Governments will have implemented new legislation and companies’ new tax strategies will be in full flow. This panel will focus on the global take-up of BEPS guidelines, from Brazil to India, the US to Japan, and everywhere in between.
  - Varying tax authority approaches;
  - Pitfalls for taxpayers; and
  - OECD updates on further transfer pricing work

Caroline Byrne, Managing Editor, TP Week and International Tax Review (Moderator)
Álvaro de Juan Ledesma, Tax Policy & Environment, Repsol
Louis van Melsen, Global Head of Tax, AMCo
Daniele Troisi, Director External and Government Affairs, Nissan

10.45 Coffee break

11.15 Dispute resolution
Demand for dispute resolution has never been higher for tax and transfer pricing executives. BEPS measures mean that more tax structures and international transactions will be scrutinised and questioned. And, as tax authorities and taxpayers get to grips with the increased compliance burden, more tax controversy is expected.
  - OECD work on dispute resolution;
  - Call for mandatory arbitration; and
  - Governments’ ability to process MAP and APA

Ralph Cunningham, Asia Publisher, Euromoney Legal Media Group, (Moderator)
Carolina Graterol, Global Head of Tax and Transfer Pricing, Rosen Group
Danny Houben, Global Head of Transfer Pricing, Shell
Werner Stuffer, Vice President, Head of Group Tax, ZF Friedrichshafen

12.30 Lunch

13.40 Keynote address:
Luis Carrillo, Director – Transfer Pricing, Bureau van Dijk

14.00 Country-by-country-reporting (CbCR)
A fringe tax compliance idea that became a global phenomenon in such a short space of time, CbCR is designed to give tax authorities more information about where multinationals are booking their profits. While most TP professionals are on board with the concept, there is concern about implementation costs and how the information will be used.
  - How to organise your CbCR report;
  - How governments will process the data;
  - Double taxation issues; and
  - Public CbCR

Joelle Jefferis, Deputy Editor, TP Week (Moderator)
António Calisto Pato, Global Head of Tax, Chiquita Brands International
Ross Lyons, Global Head of Tax, Rio Tinto
Harm Oortwijn, Director of International Tax, Paramount Pictures

15.15 Coffee break

15.45 IP regimes
Patent boxes, knowledge boxes and the like are a growing trend, particularly in Europe. However, the concept of implementing an IP regime to attract research and development to a country is not always viewed favourably by policy makers.
  - Various options and the benefits in Europe;
  - The OECD’s nexus approach; and
  - Opposition and alternatives

Emmanuel Llinares, Global Head of Transfer Pricing, Nera Economic Consulting (Moderator)
Tamara Jones Feddoul, EMEA Transfer Pricing Director, Schneider Electric
Philip de Homont, Principal, Nera Economic Consulting
Philippe Paumier, Associate Vice President, Global Head of Tax, Sanofi
Ralph Cunningham, Asia Publisher, Euromoney Legal Media Group
Morten Dyg Rasmussen, Senior Transfer Pricing Manager, AP Moller Maersk

17.00 Close of day one and networking drinks reception
The digital economy has expanded exponentially in recent years as businesses develop with technology and the global marketplace. Action 1 of the BEPS action plan focuses on this issue, but it is also linked to permanent establishment issues, updates to the TP guidelines and controlled foreign company rules.

- Key features of the digital economy;
- Pitfalls for governments and taxpayers; and
- The wider issue of the digital economy in BEPS

How to integrate technology with BEPS compliance

With the implementation of BEPS regulations, taxpayers face a need from authorities for reporting more information about their tax operations. Taxpayers need access to real-time information from a strategic perspective.

- Operational TP – the process of automating your internal transfer pricing process;
- Data analytics – the process of analysing information on a real-time basis to ensure your TP results are consistent with your TP policies; and
- CoC – many taxpayers will seek to automate the information that will be required under CoC reporting and will want to have the ability to analyse that information in various ways

European transfer pricing issues vs global

An overview of transfer pricing developments specific to Europe, including developments from the European parliament.

- European developments
- How Europe interacts with the US and with key developing countries; and
- Interesting litigation cases

Financial transactions

Globally, regulations for intercompany financial transactions and loans vary greatly. So it is important for in-house tax executives to stay abreast of any amendments to regulations and keep-up with relevant litigation cases.

- Recent regulation changes;
- Relevant litigation; and
- Case studies and experiences of MNEs

Close of day two
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1 REGISTER (Please tick one box)

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3 METHOD OF PAYMENT

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I would like to register for International Tax Review’s Global Transfer Pricing Forum – Europe 2016

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CANCELLATION POLICY: If you cannot attend you must cancel your registration in writing by 18 May 2016 to receive a refund less a 10% administration charge. Cancellations received after 18 May 2016, or no shows, are liable for the full conference fee (where applicable). You may send a substitute to attend in your place at no extra charge, however we must know by 24 June 2016 via email. We cannot accept verbal cancellations. If you make your booking online, by email or via the telephone, you are automatically adhering to our terms and conditions.

REGISTRATION: The registration fee includes participation in the forum on both days, documentation materials, breakfast, coffee breaks, lunches and a cocktail reception at the end of day one. All delegates are responsible for their own accommodation and travel.

PAYMENT: All registration fees must be received in full prior to the event date.

TRAVEL & ACCOMMODATION: Delegates are responsible for the arrangement and payment of their own travel and accommodation.

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