15th anniversary
Global Transfer Pricing Forum 2015
24 & 25 September 2015, Park Hyatt Hotel, Washington DC

JOIN 200+ TAX EXECUTIVES, TRANSFER PRICING PROFESSIONALS AND TAX AUTHORITIES TO:

➢ HEAR HIGH-LEVEL KEYNOTE SPEECHES: Insights from Chair of the Business and Industry Advisory Committee (BIAC) to the OECD, Internal Revenue Service and US Department of Treasury

➢ GAIN CRITICAL UPDATES: Last public opportunity to gain expert advice and ensure compliance before final BEPS guidance in October 2015

➢ DISCUSS THE LATEST TP DEVELOPMENTS and the most significant court cases on global TP controversy from the Americas, Europe and Asia Pacific

➢ PLAN YOUR TP STRATEGIES more effectively with specialised country and industry panels

➢ ASK YOUR QUESTIONS to 40+ expert transfer pricing speakers from leading multinational organisations and tax authorities

In association with:

Deloitte.

Sponsors

➢ REGISTER TODAY:
  • VISIT www.internationaltaxreview.com/TPForum2015
  • CALL +44 (0) 207 779 8334
  • EMAIL registrations@internationaltaxreview.com
Global Transfer Pricing Forum 2015
24 & 25 September 2015, Park Hyatt Hotel, Washington DC

This year TPWeek and International Tax Review celebrate the 15th anniversary of the Global Transfer Pricing Forum, taking place 24 & 25 September at the Park Hyatt Hotel in Washington DC, in association with Deloitte.

In addition to the Forum’s milestone, final BEPS guidance will be delivered in October 2015, making this year’s forum one of the last public opportunities to gain expert advice and key updates and ensure your TP strategies are compliant with the new changes.

BEPS regulations will mean taxpayers face greater reporting responsibilities to tax authorities, highlighting the importance for organisations to have access to real-time information from a strategic perspective. Delegates will be able to discuss the technological responses to managing operational TP, data analytics and Country-by-Country Reporting (CbCR) to ease the tax reporting burden and provide greater tax transparency.

Panel debates will feature speakers from government and in-house tax departments, as well as top transfer pricing advisers. Delegates can expect to hear best-practice on compliance burdens and how to combat new audit approaches from government. In addition, this year sees the return of industry-specific break-out panels to allow for a more targeted approach to your firm's transfer pricing planning.

Delegates can expect to:

• Gain unrivalled networking opportunities with over 200 international delegates
• Hear invaluable insights from government, leading tax executives and top transfer pricing professionals and advisers
• Take away key developments and keep up-to-date with emerging trends in transfer pricing

Welcoming tax executives, professionals and private practice every year from the Americas, Europe, Africa and Asia, the 15th anniversary of the Global Transfer Pricing Forum is not to be missed.

Park Hyatt Hotel
1201 24th St NW,
Washington, DC 20037,
United States

Special room rates are available for attending delegates September 23-25 at $355 + taxes per night.

To book your room, please email registrations@internationaltaxreview.com

*Please note that all delegates are responsible for their own accommodation and travel.
DAY ONE - 24 September

9.30  Registration and breakfast

10.00  Chair’s introduction and opening remarks
Sophie Ashley, Managing Editor, TPWeek
Todd Wolosoff, Global Managing Partner – Transfer Pricing, Deloitte

10.10  Keynote address
William Morris, Director - Global Tax Policy, GE; Chair, Tax Committee, Business and Industry Advisory Committee to the OECD

10.30  Technology responses to BEPS Transfer Pricing (TP): Operational TP, Data Analytics and Country-by-Country Reporting (CbCR)
As the BEPS process continues to evolve, one thing that is clear is that taxpayers will face a need for more information and greater reporting to various tax authorities. The transparency of information that is coming out of the current BEPS guidance highlights the importance for taxpayers to have access to real-time information from a strategic perspective. This is leading to various technology solutions in order to meet the various BEPS requirements that are likely to be adopted. This panel will explore these solutions including discussions on:
- 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
- CbCR reporting – many taxpayers will seek to automate the information that will be required under CbCR reporting and will want to have the ability to analyse that information in various ways

Moderator: Boris Nemirov, Partner, Deloitte
Wilson R Vieira Da Silva, Head of Tax, Latin America, Noble Agri
Sam Cicogna, Vice President & Head of ONESOURCE Transfer Pricing, Thomson Reuters
Steve Losavio, Partner, Deloitte

11.45  Coffee break and networking

12.15  Industry focus and the impact of the digital economy
The digital economy is characterised by a reliance on intangible assets and the problems related to determining the jurisdiction in which value creation occurs. With a focus on:
- Transportation & energy;
- Consumer goods/retail;
- Media & entertainment
- Industrial manufacturing
This panel will take delegates through the particular industry-related problems and provide industry insight into how to manage new challenges.

Moderator: Kristine Risberg, Partner, Deloitte
Greg Viggiano, Senior Director, Tax Planning & Research, Maersk Group
Fumiko Tamura, Director of Transfer Pricing, News Corporation
George Georgiev, Senior Director, Transfer Pricing and Economic Analyses, Siemens Corporation
Shannon Blankenship, Principal, Deloitte

13.30  Lunch and networking

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

14.05  A general BEPS update and focus on allocation of risk
In the risk versus planning scenario, how can taxpayers ensure the contracts they have in place for their tax affairs are reliable? The guidance taxpayers receive regarding risk management will have a direct impact on TP planning. The subject of risk allocation is described by the BEPS project as a core aspect of the OECD’s work on intangibles. The OECD expects to release guidance in September 2015 and this panel will focus on:
- Attribution of income to capital
- The impact allocation of risk will have on future tax planning.

Moderator: Tim Tuerff, Partner, Deloitte
Philippe Paumier, Associate Vice President, Global Head of Transfer Pricing, Sanofi Aventis
Thiago Figo, Brazilian Tax Executive
Kerwin Chung, Principal, Deloitte
Eric Wang, Partner, Sullivan & Cromwell

14.45  Coffee break and networking

15.15  European focus
This panel will focus on hot TP issues within Europe. The panel will discuss a variety of areas including the impact EC investigations into multinationals deemed to have received state aid from individual states may have on companies in general that operate within the EU.

This panel will look at:
- How companies can avoid making the same mistakes;
- What impact the investigations could make on a company’s TP arrangements; and
- The EC’s focus on patent box regimes.

Moderator: Clive Tietjen, partner, Deloitte
Eduardo Goldszal, Finance Senior Director, NCR Corporation
Keith Brockman, EMEA Tax Director, Mars, Inc.
Ramón López de Haro, Partner, Deloitte

18.00  Close of day one and networking drinks reception
### DAY TWO - 25 September

<table>
<thead>
<tr>
<th>Time</th>
<th>Session</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.30</td>
<td>Registration and breakfast</td>
<td></td>
</tr>
</tbody>
</table>
| 09.00 | Chair’s introduction and opening remarks                                  | Sophie Ashley, Managing Editor, TPWeek  
Todd Wolosoff, Global Managing Partner – Transfer Pricing, Deloitte                                                                                                       |
| 09.10 | Keynote address                                                           | Donna McComber, Deputy Director – Technical, Advance Pricing and Mutual Agreement Program, Internal Revenue Service                                                                                       |
| 09.30 | Global disputes                                                           | One clear outcome of the BEPS process is a likely increase in global TP controversy. This panel will focus on hot issues in TP controversy around the world, including the most significant court cases in the Americas, Europe and Asia Pacific over the past year. The panel will also discuss strategy for controversy management in the post-BEPS era. |
| 10.45 | Coffee break and networking                                               |                                                                                                                                                                                                        |
| 11.15 | IP planning                                                               | Many companies that are rich in intellectual property operate in countries where corporate tax can take up a significant portion of their profits if they do not plan appropriately. Multinationals are still operating in economically uncertain times. As political issues affect the euro and the price of the dollar fluctuates, it becomes more difficult for companies to establish appropriate transfer prices for IP because of the complexity in first identifying the intangible asset and then determining an accurate valuation. In particular this is increasingly difficult when you consider that not all valuable intangibles are legally protected and registered. This panel will review the latest BEPS guidance on the issues relating to intangible property and talk about what effective IP planning will look like in the post-BEPS environment. |
| 14.00 | How to assess historic supply chains in a changing environment            | In a rapidly changing global tax environment it is important for taxpayers to manage and moderate their supply chain related planning to ensure that the structures that have been put in place in the past are consistent with the evolving BEPS guidance that will be issued in September 2015. This panel discussion will focus on:  
- What taxpayers should do in assessing prior planning in supply chain restructuring; and  
- What supply chain restructuring can be expected to look like in the future. |
| 15.15 | Coffee break and networking                                               |                                                                                                                                                                                                        |
| 15.45 | India                                                                     | With the conclusion of several APAs between India and its major trading partners, India is beginning to make a breakthrough for international investors who have been uncertain about the country’s tax environment, in particular, in relation to tax adjustments and disputes in transfer pricing.  
This panel will look at:  
- The recent important developments for multinational taxpayers in India; and  
- The strategies that companies should adopt in light of these recent developments. |
| 17.00 | Close of conference                                                       |                                                                                                                                                                                                        |

### TO REGISTER, OR FOR MORE INFORMATION:

**VISIT** www.internationaltaxreview.com/TPForum2015  
**CALL** +44 (0) 207 779 8334  
**EMAIL** registrations@internationaltaxreview.com
I would like to register for International Tax Review’s

**Global Transfer Pricing Forum 2015**

24 & 25 September 2015, Park Hyatt Hotel, Washington DC

1 **REGISTER** (Please tick one box)

<table>
<thead>
<tr>
<th></th>
<th>In-house tax executives</th>
<th>Advisers/Consultants/ Private Practitioners</th>
</tr>
</thead>
<tbody>
<tr>
<td>Super early bird rate (before Friday, 5 June 2015)</td>
<td>£795 / USD 1,165</td>
<td>£1,295 / USD 1,895</td>
</tr>
<tr>
<td>Early bird rate (before Friday, 3 July 2015)</td>
<td>£995 / USD 1,465</td>
<td>£1,495 / USD 2,195</td>
</tr>
<tr>
<td>Standard rate (after Friday, 3 July 2015)</td>
<td>£1195 / USD 1,765</td>
<td>£1,695 / USD 2,495</td>
</tr>
</tbody>
</table>

Total remittance

2 **YOUR DETAILS FOR REGISTRATION** (Please print)

<table>
<thead>
<tr>
<th>DELEGATE 1</th>
<th>DELEGATE 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>Name</td>
</tr>
<tr>
<td>Job title</td>
<td>Job title</td>
</tr>
<tr>
<td>Company</td>
<td>Company</td>
</tr>
<tr>
<td>Address</td>
<td>Address</td>
</tr>
<tr>
<td>Postcode</td>
<td>Postcode</td>
</tr>
<tr>
<td>Country</td>
<td>Country</td>
</tr>
<tr>
<td>Tel</td>
<td>Tel</td>
</tr>
<tr>
<td>Fax</td>
<td>Fax</td>
</tr>
<tr>
<td>Email</td>
<td>Email</td>
</tr>
</tbody>
</table>

3 **METHOD OF PAYMENT**

Payment must be received before the conference date to guarantee your place. Please tick box to select payment method and sign agreement in box

- [ ] Bank transfer quoting reference number
- [ ] £ Account – 01043191; Sort code – 30-00-02
  - IBAN no – GB 97 LOYD 300002 01043191
  - Lloyds Bank TSB Plc, City Office, PO Box 72, Bailey Drive, Gillingham Business Park, Gillingham, Kent, ME8 0LS, UK
- [ ] $ Account – 11512129; Sort code – 30-12-18
  - IBAN no – GB 29 LOYD 301218 11512129
- [ ] € Account – 59008833; Sort code – 30-12-18
  - IBAN no – GB 25 LOYD 301218 59008833
- [ ] SWIFT address: LOYD GB2 LCTY

- [ ] Please find cheque enclosed (please make payable to Euromoney Trading Ltd)

To make a payment by credit card, please register and pay online at bit.ly/GTPF2015-booking or call +44 (0) 20 7779 8718

Please note that in completing this booking form you undertake to adhere to the cancellation and payment terms listed below.

Signature: Date: Position:

The information you provide on this form will be used by Euromoney Institutional Investor PLC and its group companies ("we" or "us") to process your order and deliver the relevant products/services. We may also monitor your use of the website(s) relating to your order, including information you post and actions you take, to improve our services and track compliance with our terms of use. Except to the extent you indicate your objection below, we may also use your data (including data obtained from monitoring) (a) to keep you informed of our products and services; (b) occasionally to allow companies outside our group to contact you with details of their products/services; or (c) for our journalists to contact you for research purposes. As an international group, we may transfer your data on a global basis for the purposes indicated above, including to countries which may not provide the same level of protection to personal data as within the European Union. By submitting this order, you will be indicating your consent to the use of your data as identified above.

Further detail on our use of your personal data is set out in our privacy policy, which is available at www.euromoneyplc.com or can be provided to you separately upon request.

If you object to contact by telephone, fax, or email, or post, please tick the relevant box. If you do not want us to share your information with our journalists, or other companies please tick the relevant box.

**TO REGISTER:**

- ONLINE bit.ly/GTPF2015-booking
- TEL +44 (0) 20 7779 8334
- EMAIL registrations@internationaltaxreview.com

**MAIL**

- Alicia Sprott
- International Tax Review
- 8 Bouverie Street
- London EC4Y 8AX

**ADMINISTRATIVE INFORMATION**

**CANCELLATION POLICY:** If you cannot attend you must cancel your registration in writing by 27 August 2015 to receive a refund less a 10% administration charge. Cancellations received after 27 August 2015, or no shows, are liable for the full conference fee. You may send a substitute to attend in your place at no extra charge.

**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.

Euromoney Legal Media Group offers a 50% to 100% reduction on registration fees to any private practice lawyers wishing to attend the event, but cannot do so due to financial hardship. To apply, please send your registration details and an explanation of hardship by email to Alicia.sprott@legalmediagroup.com at least one week before the event. All walk-in requests for discounted or free entry will be refused. This course is appropriate for both newly admitted and experienced attorneys.