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17-18 MARCH, 2020

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PROGRAMME: DAY I

8:20 REGISTRATION

8:50 OPENING COMMENTS

9:00 Keynote address: an update from the OECD

A review of the current transfer pricing landscape and the progress of implementation of recent OECD measures

9:25 Transfer pricing implications of US Tax Reform

- BEAT regulations
- How to adapt your transfer pricing structure
- How GILTI and FDDI impact transfer pricing arrangements
- Has tax reform successfully addressed transfer pricing issues?

SPEAKERS

Dara Kasouaher, director of transfer pricing, **Mondelez International**

Scott Campbell, global tax director, **At-PAC**

Amit Mangla, tax director, **Allergan**

Keith Brockman, VP global tax, **Welbilt**

10:15 Post-panel roundtable discussions

These roundtable discussions will provide the opportunity to debate with your peers about the key issues that emerged during the previous panel discussion on US Tax Reform.

10:30 COFFEE AND NETWORKING

11:00 Assessing the OECD's 'Unified Approach'

- What are the benefits? What are the shortcomings?
- How will the new nexus and profit allocation rules impact multinationals?
- What measures can be taken to reduce the risk of double taxation?
- How will disputes be resolved?

SPEAKERS

Niraja Srinivasan, VP global transfer pricing, **Dell**

Harlow Higinbotham, managing director, **NERA**

Nihan Mert-Beydilli, associate director – transfer pricing, **NERA**

Lorraine Eden, research professor of law and professor emerita of management, **Texas A&M University**

11:50 Operational TP and digitalisation

- Strategies for building an effective operational TP environment
- What needs to change? Where should investment be directed?
- How can existing systems be used to overcome data and process issues?
- Finding the place for transfer pricing within your wider tax technology plan

SPEAKERS

Albert Heber, associate director – global transfer pricing, **Zimmer Biomet**

Pat Dervin, director of transfer pricing, **Aon**

George Stasny, manager – transfer pricing, **Halliburton**

Carmen White, director – tax technology, **Microsoft**

12:40 LUNCH AND NETWORKING

13:45 Transfer pricing of intangibles

- Best practice for defining and valuing intangibles
- Methods for establishing comparability

SPEAKERS

Azedine Assassi, global transfer pricing leader, **GE**

Kay Freund, director – global transfer pricing, **Medtronic**

Jeff Lonard, manager – transfer pricing, **ITW**

Rick Cooper, vice president, **Charles River Associates**

Sanford Stark, partner, **Morgan Lewis**

14:35 TP documentation and CbCR

- Hear from multinationals on their experiences with documentation & CbCR
- How is the collected data being used?
- How to identify gaps in your CbCR filings that may be questioned by multiple tax authorities

SPEAKERS

Amy Pinson, senior manager – transfer pricing, **Bayer**

Tosin Akande, senior vice president – transfer pricing, **Citi**

Jason Wiegand, associate director – global transfer pricing, **Procter & Gamble**

Sadia Nazir, director – global transfer pricing, **Clarios**

15:25 COFFEE AND NETWORKING

15:55 Permanent establishments post-BEPS

- Managing PE risk
- Guidance on the attribution of profits to PEs
- Challenges with taxing digital PEs

SPEAKERS

Guglielmo Maisto, partner, **Maisto e Associati**

Aurelio Massimiano, partner, **Maisto e Associati**

16:45 Global transfer pricing developments: China, India and LATAM

- Explore the latest developments in China, India and LATAM
- How are multinationals managing relationships with tax authorities in these jurisdictions?
- Assess regional responses to BEPS and what this means for your transfer pricing policy

SPEAKERS

Abhishek Chawla, tax director, **Xerox**

David Garcia Morales, head of corporate tax, **Geopark**

Meghan Grady, Americas tax director, **Barry Callebaut Group**

Fernando Colucci, partner, **Machado Meyer**

17:35 CLOSING COMMENTS AND NETWORKING DRINKS RECEPTION



PROGRAMME: DAY 2

8:40 REGISTRATION

9:10 OPENING COMMENTS

9:20 Keynote address: international TP case law
A review of the most recent transfer pricing cases

9:50 Financial transactions

- What is the latest OECD guidance?
- Explore the impact of the FTTTP on treasury centres and how to deal with unintended consequences of TP rules
- Understand the issues related to inter-company loans, guarantee transactions and cash pooling

SPEAKERS

Joan Hortalà Vallvé, partner, Cuatrecasas
Scott Campbell, global tax director, At-PAC

10:40 COFFEE AND NETWORKING

11:10 Roundtable discussions

These interactive roundtable discussions will provide a unique opportunity to work closely with your peers to develop strategies for managing important transfer pricing issues. Discussions will be followed by a presentation of key findings by the roundtable chairs.

Roundtable A: The future of the arm's-length principle

Discuss whether the arm's-length principle will remain and, if so, how it will interact with new rules

Roundtable B: Transfer pricing risk-analysis post-BEPS

Assess whether BEPS has decreased risk appetite, and how to manage increasing transparency and scrutiny from tax authorities

Roundtable C: Managing an international audit

Debate best practices for managing an international audit

SPEAKER

Dave Thomsen, global transfer pricing, Keysight Technologies

Roundtable D: Transfer pricing post-M&A

Explore the challenges of implementing TP processes, policies and arrangements in a post-merger/acquisition environment

12:50 LUNCH AND NETWORKING

14:10 Dispute avoidance and resolution

- Navigating disputes amid a changing controversy landscape
- How to capitalise on recent initiatives on dispute prevention
- Seeking certainty through APAs
- Alternative dispute resolution

SPEAKERS

Brian Gleicher, partner, White & Case (moderator)
John Wall, APMA assistant director, IRS
Sonal Majmadur, adviser – global tax team, World Bank Group
Sue Huang, associate tax director – transfer pricing, Intel

15:00 CLOSING COMMENTS

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