



Global Transfer Pricing Forum 2020

VIRTUAL EVENT
December 1 & 2

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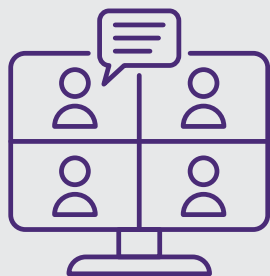
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Overview

The US edition of the ITR Global Transfer Pricing Forum will be taking place virtually on December 1-2 to provide leading transfer pricing professionals with critical insight and advice on core transfer pricing issues. Key discussion points include: impact of Covid-19, US tax reform, digital taxation, financial transactions, dispute resolution and more.

Join us to:

INTERACT



Actively engage with speakers during panel discussions on key issues through live Q&A and polling functions

NETWORK



Discuss and debate with your peers to problem solve, share ideas, opinions and experiences

LEARN



Gain exclusive insights from the OECD, leading advisers and in-house professionals on the current TP landscape and receive practical tips for operating in this volatile environment

Confirm your place today at events.internationaltaxreview.com/globalTPforumUS

If you would like to join as an expert speaker, please contact lucy.huckle@euromoneyplc.com

Schedule – December 1

CST

8:50-9:00 **Opening comments**

9:00-9:25 **Keynote address**

SPEAKER

Manuel de los Santos Poveda, adviser – CTPA, **OECD**

9:25-10:00 **Global transfer pricing review – current landscape and future outlook**

- Impact of Covid-19 on transfer pricing structures
- Transfer pricing in a downturn economy
- Other key regulatory developments

SPEAKER

Marina Gentile, global transfer pricing lead, **Withum**

10:00-10:30 **Networking break**

10:30-11:15 **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, director, **NERA Economic Consulting**

Harlow Higinbotham, managing director, **NERA Economic Consulting** (*moderator*)

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

11:15-11:30 **Networking break**

11:30-12:15 **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**

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

Dasantila Maksutaj, group tax director, **Terumo Medical Corporation**

Schedule – December 1, continued

CST

12:15-13:15 **Lunch and networking**

13:15-14:00 **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

Pat Dervin, director of transfer pricing, **Aon**
George Stasny, manager – transfer pricing, **Halliburton**
Carmen White, director – tax technology, **Microsoft**

14:00-14:15 **Networking break**

14:15-15:00 **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

Yoshio Uehara, partner, **Chevez Ruiz Zamarripa** (moderator)
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**
Oscar Campero, partner, **Chevez Ruiz Zamarripa**

15:00 **Closing comments and close of day one**

Schedule – December 2

CST

9:30-9:40 **Opening comments**

9:40-10:25 **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**
Sanford Stark, partner, **Morgan Lewis**

10:25-11:00 **Financial transactions**

- What is the latest OECD guidance?
- Explore the impact of the FTTP 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

Joy Harper, finance systems, integration and transformation, **Google**

11:00-11:30 **Networking break**

11:30-12:15 **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**

Schedule – December 2, continued

CST

12:15-13:10 **Lunch and networking**

13:10-13:55 **Permanent establishments post-BEPS**

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

13:55-14:10 **Networking break**

14:10-14:55 **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**

14:55 **Closing comments**