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GLOBAL TRANSFER PRICING FORUM - EUROPE 2019

SEPTEMBER 26 & 27
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OVERVIEW

Renowned publishing brand *International Tax Review* is pleased to be hosting the 19th annual Global Transfer Pricing Forum in Amsterdam on 26-27 September. Over the course of two days, in-house transfer pricing professionals, leading advisers and senior policymakers will be brought together to debate the most significant topics and trends currently impacting the industry.

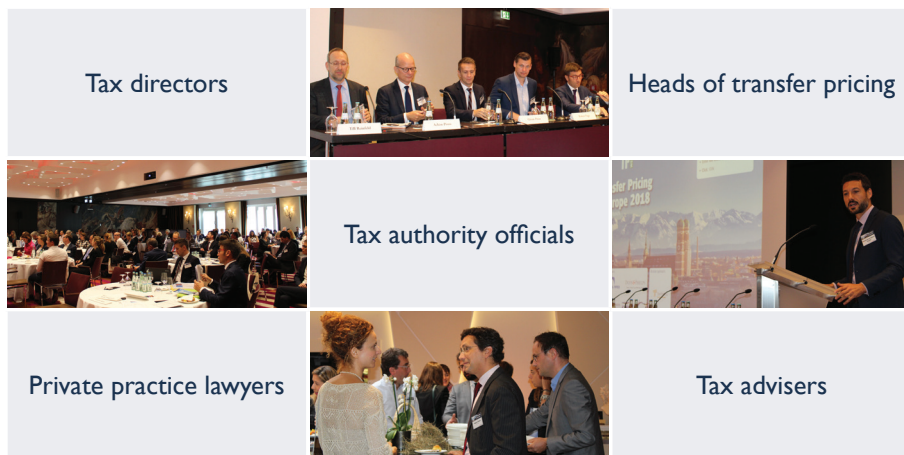
The Forum is not intended as a traditional educational style seminar. The aim is to facilitate free and transparent debate on salient issues such as the OECD's taxation of the digital economy, developments in risk and compliance management and the rise in TP disputes. As such, taxpayers are invited to openly share experiences of how to deal with a rapidly evolving global transfer pricing environment.

Instead of traditional press reporting on the event, *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 *ITR*.

Reserve your place today.

JOIN 100+ SENIOR TAX AND TRANSFER PRICING PROFESSIONALS INCLUDING:



VENUE

NH Grand Hotel
Krasnapolsky
Dam 9
1012 JS Amsterdam
Netherlands



BENEFITS OF ATTENDING

- Gain insight from the OECD on the current transfer pricing landscape
- Discuss the practical implications of recent legislative measures
- Closely explore specific transfer pricing issues through interactive roundtable discussions
- Network with 150+ senior tax and transfer pricing executives from leading multinational organisations

REGISTRATIONS

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PROGRAMME

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PROGRAMME: DAY I

8.10 REGISTRATION

8.45 OPENING COMMENTS

SPEAKER

Anjana Haines, managing editor, *International Tax Review*

8.50 WELCOME ADDRESS

SPEAKER

Maik Heggmaier, head of transfer pricing, *WTS Global (Germany)*

9.00 KEYNOTE ADDRESS

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

SPEAKER

Manuel de los Santos Poveda, adviser – CTPA, OECD

9.30 Taxation of the digital economy

- Assessing the scope of the OECD's digital tax proposal
- User participation, marketing intangibles and significant economic presence: understanding the alternative allocation of profits
- How do we define marketing intangibles?
- Are we moving beyond the arms-length principle?

SPEAKERS

Jared Walls, partner, *Valentiam, WTS Global (US) (moderator)*

Jean-Louis Barsac, head of transfer pricing, *Nokia*

Manuel de los Santos Poveda, adviser – CTPA, OECD

Lucia Fedina, head of global transfer pricing, *CBRE*

Rodrigo Covarrubias, partner, *Skatt*

10.30-10.45 Post-panel table discussions

10.45 COFFEE AND NETWORKING

11.15 Financial transactions: recent developments and future outlook

- Hear an update on the OECD's work on transfer pricing for financial transactions
- Gain insight into the impact the FFTP has on treasury centres and how to deal with unintended consequences of TP rules
- Understanding the issues related to inter-company loans, guarantee transactions and cash pooling

SPEAKERS

Joan Hortalà Vallvé, partner, *Cuatrecasas (moderator)*

Andy Neuteleers, partner, *T/A Economics, WTS Global (Belgium)*

Daniel Ransom, transfer pricing director, *GSK*

Rogier Sterk, senior tax adviser, *Loyens & Loeff*

Joy Harper, head of treasury & tax, *Google*

Giacinto Valenti, head of transfer pricing, *UniCredit*

12.15 Post-BEPS supply chain modelling

- Restructuring post-BEPS: strategies for adapting current supply chains
- Modelling your supply chain to help manage risk, ensure compliance and increase tax value for your company
- Managing conflicts presented by valuation rules as supply chains are restructured

SPEAKERS

David Forst, partner, *Fenwick & West (moderator)*

Önder Albayrak, deputy head of global transfer pricing, *Sanofi*

Parmesh Rajani, head of transfer pricing, *Kingfisher*

Axel Nientimp, partner, *WTS Global (Germany)*

Marta Pankiv, director of tax, *Tricentis*

13.05 LUNCH AND NETWORKING

14.00 Operational TP and digitalisation

- Building an effective operational TP environment – what needs to change? Where should investment be directed?
- Utilising existing systems and new tools to overcome data and process issues
- Strategies for developing a group-wide strategy on tax-tech and finding the place for transfer pricing within this

SPEAKERS

Raymund Gerardu, managing partner, *TPA Global (moderator)*

Olivier Noel, head of global transfer pricing, *Avnet*

Isabel Karl, operational transfer pricing, *Deutsche Bank*

Katarina Petovska, global senior transfer pricing manager, *Dell*

Andreas Riedl, partner, *WTS Global (Germany)*

Gyorgy Ahmann, transfer pricing manager – operations, *Diageo*

14.50 Risk assessment: ICAP 2.0

- Assessing the outcome of the ICAP pilot programme and the latest improvements
- Tips for working towards a more cooperative compliance model
- Moving ICAP forward – the role of government bodies, tax authorities and corporations

SPEAKERS

Ruth Steedman, partner, *FTI Consulting, WTS Global (UK) (moderator)*

Mark Johnson, head of unit, tax dispute prevention/CbC reporting, *OECD*

Rocio Bermudez, transfer pricing & tax global practices senior manager, *Repsol*

Maria Teresa Ruiz de Azua, global transfer pricing manager, *Procter & Gamble*

15.40 COFFEE AND NETWORKING

16.10 Global perspectives on transfer pricing issues: China, India and LATAM

- Explore the latest transfer pricing developments in China, India and LATAM
- Hear from multinationals on how they're managing their relationships with different tax authorities in these regions
- Assess how these regions are responding to BEPS and what this means for your TP policy

SPEAKERS

Kathrin Zoeller, head of global transfer pricing, *Weatherford (moderator)*

Raffaele Petrucci, managing director, *WU Transfer Pricing Centre*

Avni Dika, head of global transfer pricing, *Syngenta*

Sam Sim, head of transfer pricing Asia Pacific, *WTS Global (Singapore)*

Andrea Grainger, head of transfer pricing, *Swiss RE*

Clark Armitage, member – transfer pricing and international tax, *Caplin & Drysdale*

17.00 CLOSING COMMENTS

SPEAKER

Josh White, deputy editor, *International Tax Review*

17.10 DRINKS RECEPTION

PROGRAMME: DAY 2

8.45 REGISTRATION

9.20 OPENING COMMENTS

SPEAKER

Anjana Haines, managing editor, *International Tax Review*

9.30 **Profit-split method**

- Hear the latest OECD guidance
- Discuss practical applications

SPEAKERS

Josh White, deputy editor, *International Tax Review* (*moderator*)
Martin Lagarden, head of global transfer pricing, *Henkel*
Manuel de los Santos Poveda, adviser – CTPA, *OECD*
Bodo Roglmeier, head of international tax and tax compliance, *UniCredit*

10.20 **Global perspectives on transfer pricing issues: Germany, UK, Russia and Japan**

- Explore the latest transfer pricing developments in these regions
- Hear from multinationals on how they're managing their relationships with different tax authorities
- Assess how these regions are responding to BEPS and what this means for your TP policy

SPEAKERS

Brian Gleicher, partner, *White & Case* (*moderator*)
Enrique Guzman, transfer pricing specialist, *Hitachi Europe*
Alistair Wadey, senior tax director – transfer pricing, *PepsiCo*
John Willows, transfer pricing manager, *Wyelands Capital*
Bodo Bender, partner, *White & Case*

11.10 COFFEE AND NETWORKING

11.40 **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: Transfer pricing risk analysis post-BEPS

- Has BEPS decreased risk appetite? How do you manage increasing transparency and scrutiny from authorities?

FACILITATORS

Gian Luca Nieddhu, head of transfer pricing, *Hager & Partners*
Dietmar Huber, manager partner, *Hager & Partners*

Roundtable B: TP documentation and CbCR

- Discuss practical experiences with Country by Country Reporting and find out how tax authorities have been responding

FACILITATOR

Brian Gleicher, partner, *White & Case*

Roundtable C: US tax reform: a new TP landscape

- Assess post-legislation developments – what have the practical implications been and how have companies successfully adapted?

FACILITATOR

Lucia Fedina, head of global transfer pricing, *CBRE*

Roundtable D: Guidance on the transfer pricing of intangibles

- Debate best practices for identifying and valuing intangibles and share methods for establishing comparability

FACILITATOR

Robert Hartley, partner, *Mishcon de Reya*

Roundtable E: TP documentation and CbCR

- Discuss practical experiences with Country by Country Reporting and find out how tax authorities have been responding

FACILITATOR

Frank Groffi, group tax counsel – transfer pricing and business models, *Nestlé*

Roundtable F: US tax reform: a new TP landscape

- Assess post-legislation developments – what have the practical implications been and how have companies successfully adapted?

FACILITATOR

Kathrin Zoeller, head of global transfer pricing, *Weatherford*

Roundtable G: Guidance on the transfer pricing of intangibles

- Debate best practices for identifying and valuing intangibles and share methods for establishing comparability

FACILITATOR

Gary Richards, partner, *Mishcon de Reya*

Roundtable H: Transfer pricing post-M&A

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

FACILITATOR

John Willows, transfer pricing manager, *Wyelands Capital*

Roundtable I: The future of the arms-length principle

- Discuss whether the arms-length principle should remain and, if so, how?

FACILITATOR

Eduardo Floering, head of transfer pricing, *Muller Group*

Roundtable J: Managing an on-site audit

- Debate with your peers best practices for managing an on-site audit

FACILITATOR

Rocio Bermudez, transfer pricing & tax global practices senior manager, *Repsol*

Roundtable K: Interpreting DAC6

- Share insights into how to overcome increased compliance challenges and discuss how different countries are interpreting DAC6 and what this means for you

FACILITATOR

Roxana Popel, head of tax, *CMS Romania*

13.10 LUNCH AND NETWORKING

14.10 **Top tips for successful dispute resolution**

- Practical guidance for avoiding and resolving disputes
- Assessing recent initiatives on dispute prevention
- Strategies for developing a large network of APAs

SPEAKERS

Xavier Daluzeau, partner, *CMS France* (*moderator*)
Marlies Vermeulen, managing director – global transfer pricing, *Applied Materials*
Markus Schneider, transfer pricing manager, *Bayer*
Bartłomiej Wajda, counsel, *CMS Poland*
Christian Runge, global head of transfer pricing and tax technology, *Shell*

15.00 KEYNOTE ADDRESS

SPEAKER

Jared Walls, partner, *Valentiam, WTS Global (US)*

15.30 CLOSING COMMENTS

SPEAKER

Josh White, deputy editor, *International Tax Review*

15.40 CLOSE OF CONFERENCE

BOOKING FORM

	Tax Executives	Advisers/Consultants/ Private Practitioners*
Early bird rate (before August 2)	<input type="checkbox"/> FREE	<input type="checkbox"/> €995
Standard rate (after August 2)	<input type="checkbox"/> FREE	<input type="checkbox"/> €1,295

*If your firm is not based in the Netherlands you are subject to the local 21% VAT rate

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

Signature:

Date:

Position:

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