



MANAGING GLOBAL TAX DISPUTES SUMMIT

APRIL 28, 2020

THE WALDORF HILTON, LONDON

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 #ITRTaxDisputes

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OVERVIEW

The last decade has seen a huge increase in the volume, value and complexity of cross-border transactions in Europe. In addition, OECD BEPS and EU ATAD have provided several new, but somehow ambiguous, tools to tax administrations to strike down tax planning schemes. As a result, the number of tax disputes and related audits is expected to increase sharply, which makes effective management of these procedures more important than ever.

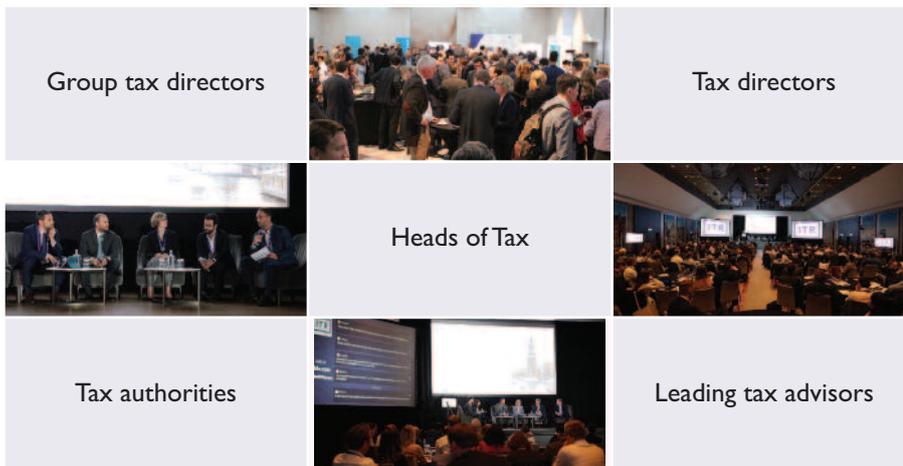
The lack of a globally accepted set of rules to govern the taxation of MNEs, coupled with how little has changed in the way that governments try to resolve them, has resulted in the number of unresolved cases continuing to grow and an increase in unrelieved double taxation.

Hence, it has become increasingly challenging to operate national tax systems in a borderless world, with the debate continuing on whether MNEs are paying their fair share of the tax burden and whether the tax they pay in each of the jurisdictions in which they operate reflects where the value is created.

ITR's annual Managing Global Tax Disputes Summit 2020 will address all of these concerns and bring together senior corporate in-house tax practitioners from a range of industries to discuss practical and strategic issues relating to international tax disputes.

Join our leading tax dispute experts to gain insights into what tax professionals are doing now, in an increasing tax controversy climate in Europe and beyond.

GUARANTEED DECISION MAKER AUDIENCE INCLUDES:



JOIN OVER 100 SENIOR TAX PROFESSIONALS TO:

- Hear from European tax authorities and regulators about recent developments regarding tax dispute resolution within the European Union
- Hear from other tax professionals about why they are considering alternative dispute resolution strategies and techniques
- Network with Europe's most senior group of tax directors and business professionals
- Benefit from industry perspectives and the insights of leading advisors at the forefront of tax disputes

“ Very interesting panels ”

Nina Kristensen, Danish Ministry of Taxation

“ What I liked most about the Forum was the in-house counsel participation to better understand challenges they face and steps taken to deal with them ”

Brian Duffy, William Fry Tax Advisors

“ Great to meet a variety of tax professionals. Great to hear about views from both tax authorities and in-house tax professionals ”

Jackie Colun, Diploma

PROGRAMME

08.15 REGISTRATION AND NETWORKING BREAKFAST

08.50 CHAIRMAN'S OPENING REMARKS

Anjana Haines, managing editor, ITR

09.00 OPENING ADDRESS: Latest insights and developments in tax certainty

This session will look at the OECD's approach on disclosures and income in different countries and how to gain international tax certainty.

- Latest on OECD transparency agenda
- ICAP and other routes to greater tax certainty
- Update on OECD pillar one and pillar two
- Mitigating the risk of disputes and uncertainty (and double taxation)

SPEAKER

Mark Johnson, head of unit - tax certainty and CbC reporting, OECD Centre for Tax Policy & Administration

09.30 **PANEL NO 1: Transfer pricing and related tax dispute activities - minimising the risk**

This session will examine transfer pricing including financing and captives with an overview of the latest legislation coupled with practical experiences.

- Transfer pricing or partial exemption methodologies?
- Interpretation of the law for multiple jurisdictions
- The EU Anti-Tax Avoidance Directive (ATAD 1 and 2) - how to avoid the pitfalls?
- Anti-hybrid mismatch legislation (BEPS Action 4 and EU equivalent) - dealing with staggered implementation and assessment risks
- How to approach mandatory disclosure rules and DAC6 – who, what and how will MNEs report?

SPEAKER

Jesper Howes, head of tax, Maersk Tankers

Yordan Nenkov, head of investment tax, Partners Group

Enrique Guzman, transfer pricing specialist, Hitachi Europe

10:20 NETWORKING TEA AND COFFEE BREAK

10.50 **PANEL NO 2: Advance pricing agreements - top tips for successful negotiations**

This panel will look at recent initiatives on dispute prevention and at strategies for developing a large network of APAs.

- Bilateral/multilateral APAs and other routes to tax certainty - global trends
- Minimising the weaknesses of APAs and optimising their strengths
- Establishing a cross-border dialogue in APA negotiations
- Participating in ICAP vs APAs
- APA negotiations - getting the right people around the table

SPEAKERS

Sangini Sewmangal, global head of tax, Centrinet Pharmaceuticals

Eduardo Flöring, head of transfer pricing, Theo Müller Group

11:40 **PANEL NO 3: Techniques on how to avoid MAP and arbitration in international tax**

Our panel of competent authorities will present and discuss their experiences on MAP and dispute arbitration.

- Is Action 14 already delivering?
- What are the trends in the main jurisdictions and developing countries?
- How do MNEs deal with the continuous increase and timescale of MAP cases?
- Alternatives to a MAP
- Supplementary dispute resolution E
- Is it possible to avoid disputes altogether?

12.50 LUNCH

PROGRAMME

13.30 ROUNDTABLE DISCUSSIONS:

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

ROUNDTABLE A: Practical approaches to dealing with tax authorities - be one step ahead

This session will examine how you deal with inspectors during an audit and one-to-one meetings, and how to work with local advisors in each country to develop an effective approach to instructing. Practical examples of negotiated agreements with key countries such as Germany, France, and Italy will be used.

SPEAKER

Tim Mathey, director European tax, Electronic Arts

ROUNDTABLE B: Negotiating settlements and avoiding reputational damage

This roundtable looks at the important elements of negotiating a settlement and ensuring any disputes are dealt with as quickly as possible and at little cost.

SPEAKERS

Enrique Guzman, transfer pricing specialist, Hitachi Europe

Sangini Sewmangal, global head of tax, Centrinet Pharmaceuticals

ROUNDTABLE C: Using technology and monitoring software to your advantage

Effective use of data and software systems are paramount for local reporting duties, this session looks at how the use of international data collated can support your business.

SPEAKER

Aicha Nianzou, global indirect tax director, Wabco

ROUNDTABLE D: Talking to the board about the risks of tax disputes

It is key to educate both the tax team and wider business about the risks posed by certain business practices. This roundtable will provide tips and suggestions on how you should be talking to the board.

SPEAKER

Carlos Joaquin Enrech Frances, head of tax, Ferrovial

14.30 PANEL NO 4: Tax disputes and digitalisation - practical analysis and solutions

- Conflict between DSTs and dealing with double taxation disputes
- How technology could help manage dispute risks and challenging tax assessments
- BEPS compliance - practical consequences from a tax controversy perspective

SPEAKERS

Carlos Joaquin Enrech Frances, head of tax, Ferrovial

Aicha Nianzou, global indirect tax director, Wabco

15.20 NETWORKING TEA AND COFFEE BREAK

15.40 CASE STUDY: EU state aid investigation - an update

This session will look at state aid in the context of international taxation, as well as the concept of abuse in EU law and international law. It will examine crucial judgments from the General Court of the European Union - recent cases such as Fiat, Starbucks, Santander and Nike.

SPEAKER

European Commission

16.10 PANEL NO 5: Management of cross-border tax audits

This panel will examine the trends in tax audits and litigation over the last two years, with practical experiences of MNEs - in particular those countries that are more developed in their use of other measures besides audits (UK, Netherlands, US, Australia).

- Joint audits and co-operation between tax authorities
- Transparency and cross border transactions / audits - how do tax authorities cooperate?
- Resolution of cross-border bilateral adjustments
- Establishing the "right" TP arrangement that carries no audit risk
- An overview of the top recent cases - Glencore, Altera, Macquarie and the Danish withholding tax and beneficial ownership cases
- Cases to watch

SPEAKER

Tim Mathey, director European tax, Electronic Arts

17:10 CLOSING REMARKS AND COCKTAIL RECEPTION

BOOKING FORM

	Senior Tax Executives	Advisers/Consultants/ Private Practitioners
Early bird rate (before March 13)	<input type="checkbox"/> FREE	£795 + VAT
Standard rate (after March 13)	<input type="checkbox"/> FREE	£995 + VAT

YOUR DETAILS FOR REGISTRATION (PLEASE PRINT)

Delegate

Name: _____

Job title: _____

Company: _____

Address: _____

Postcode: _____

Country: _____

Tel: _____

Email: _____

Please photocopy this page if registering more than one delegate

METHOD OF PAYMENT

Please tick the appropriate box to choose your payment method and sign below:

- Bank transfer (details will be provided by invoice)
- Credit card payment (pay online at <https://events.internationaltaxreview.com/TaxDisputes20> or call +44 (0) 20 7779 8334)

REGISTRATION: All registrations are subject to final review. Where the registration fee applies, the fee is charged in GBP

PAYMENT: All registration fees (where applicable) must be received in full prior to the invoice due date or event date, whichever is sooner.

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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CANCELLATION POLICY:

By registering for an event, you are agreeing to the [Event Participant Terms and Conditions](#).

Validly registering for an Event shall entitle you to admittance to that Event as a Participant, subject to these Terms.

FREE DELEGATES:

By registering for an event, you are agreeing to the terms and conditions whereby you are liable for a cancellation fee of \$199 if you cancel less than 48 hours before the event. All cancellations must be received in writing no later than April 21, 2020. We cannot accept verbal cancellations. Cancellations received after April 21, 2020 are liable for the \$199 fee.

PAYING DELEGATES:

All cancellations by Participants must be received in writing no later than 6 weeks before the first day of the Event (March 17, 2020) for a full refund of Participant Fees paid, less a 10% administration charge. We cannot accept verbal cancellations. Participants whose cancellations are received after this deadline (March 17, 2020) shall be liable for the full Fee. Participants may nominate a substitute to attend an Event in their place at no extra charge, and the replacement's agreement and compliance with these Terms. Attendees found wearing falsified Event passes and/or sharing or swapping Event passes shall be required to leave the Event.

If, as a result of Force Majeure, ITR cancels the Event, ITR shall use its reasonable endeavours to reschedule the Event to take place within two months of the original Event Dates. If ITR is unable to reschedule the Event, it shall refund the Participant Fees as soon as reasonably practicable and in any event within 60 days from the date of notice of cancellation. The full Cancellation Policy can be read in the aforementioned Event Participant Terms and Conditions.

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