

# SESSIONS

## CONFERENCE DAY 1 - 19/09/2023

## International Tax Congress

19 - 20 September 2023  
Leonardo Royal Hotel London City  
London, UK

### Registration & Refreshments

08:30 - 09:15

### Chair's Opening Remarks

09:15 - 09:20

### Participants

**Cara Griffith** - President and CEO, TAX ANALYSTS

### The International Tax Landscape: The Policy Makers' and Tax Authority Perspectives

09:20 - 10:10

### Participants

**Robert Beattie** - TP Delegated Competent Authority and BAI Business International, HMRC

**Katerina Perrou** - Legal Counsel, Governor's Office, HELLENIC REPUBLIC, INDEPENDENT AUTHORITY FOR PUBLIC REVENUE

**Moderator: Jamie Bedford** - Partner, DELOITTE

### Implementation of BEPS Pillar 2: Current Developments

10:10 - 11:00

- Update on Pillar 2: how to tackle it once it is implemented; data gathering, system readiness and compliance considerations
- Impact for businesses in Europe: what will the revenue effects be?
- Implementing Pillar 2: What does this mean for business in Europe? How will revenue be affected?
- Impact of the global minimum tax rules on investments
- How the global minimal tax will impact existing programmes and change incentives for investors
- Navigating the inconsistencies arising from the implementation of GloBE rules by different countries at different times: The road ahead
- Is Pillar 2 the wake-up call to transform the tax function?
- Interplay of Pillar 2 and tax incentives

### Participants

**Noah Gaoua** - Tax Director, ROCHE GROUP

**Róbert Csabai** - Head of International Taxation & Transfer Pricing, HUNGARIAN MINISTRY OF FINANCE

**Cara Griffith** - President and CEO, TAX ANALYSTS

**Lisa Shipley** - Director, Tax Policy Group, DELOITTE

### Networking Break

11:00 - 11:30

### Pillar 2 and Qualified Domestic Minimum Top-up Taxes

11:30 - 12:10

- Overview of qualified minimum domestic top-up taxes
- Challenges and complexities in implementing QDMTT
- Understanding the relationship between QDMTT and ILR under the EU's Anti-Tax Avoidance Directive (ATAD)
- How QDMTT may influence cross-border investments and the location of economic activities
- Evaluation of potential measures to balance tax policy objectives with maintaining an attractive investment environment

### Participants

**Ravid Barzilay** - VP Global Tax, TEVA

**Reinout de Boer** - Partner, STIBBE

### The Big Push for Transparency

12:10 - 13:00

- Overview and the current state of tax transparency
  - Uncertainty of applying the GAAR
  - ATAD3 DTAA and interplay between GAAR
- Evaluation of the existing tax transparency frameworks and regulations within the EU
  - Analysis of their effectiveness in addressing tax avoidance and ensuring fair taxation
  - Identification of gaps or areas for improvement in the current system
  - Refocus on CbCR and mandatory public disclosure
- Changes required in existing processes and methodologies for CbCR preparation and reporting
  - Hybrid mismatches and thin capitalisation (heavily tax structures equity vs debt structures): increased requirements in tax transparency
  - Australia Combined Assurance review – ATO

### Participants

**Kiran Aziz** - Head of Responsible Investments, KLP KAPITALFORVATNING AS

**Lucy Gregory** - International Tax Adviser, EBRD

**Moderator: Oleh Fedusiv** - Senior Tax Manager, UBER

**Lucia Higgs** - Consulting Services Manager - Enterprise Software, WOLTERS KLUWER

### Networking Lunch

13:00 - 14:00

### Navigating Tax Challenges in Global Mobility

14:00 - 15:00

- Clarifying risks involved in short- and long-term business travel, payroll implications, and host country compliance
- How share incentives and other benefits travel between jurisdictions
- Pros and cons of employing full-time employees vs contractors
- Need for effective collaboration between HR and tax departments

### Participants

**Nupur Jalan** - International Tax and Transfer Pricing, TRIVAGO

**Katerina Perrou** - Legal Counsel, Governor's Office, HELLENIC REPUBLIC, INDEPENDENT AUTHORITY FOR PUBLIC REVENUE

**Elissavet Grout** - Senior Counsel, TRAVERS SMITH

**Roxanne Minbatiwala** - Group Head of Reward, SSP GROUP PLC

**Jessie Gaston** - Partner, ORRICK

### Networking Break

15:00 - 15:30

### Digitalisation of Tax and VAT in the Digital Age

15:30 - 16:15

- Leveraging opportunities posed by digitalisation: reducing compliance burdens for businesses.
- Increased capacity of tax authorities to counter tax avoidance
- Future of EU's ViDA proposals
  - Digital reporting requirements
  - How ViDA will expedite the implementation of tax compliance system
  - Understanding the new E-Invoicing directive
  - Deemed supplier VAT obligations
- How to strike the balance between standardisation and individual approaches
- Exchange of data and information to investors: how much information is too much?

### Participants

**Raquel Costa** - Global Tax and Compliance Manager, INFINEON TECHNOLOGIES

**Aleksandra Bal** - Indirect Tax Technology and Operations Lead, STRIPE

**Oleh Fedusiv** - Senior Tax Manager, UBER

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## Latest Updates on Transfer Pricing in the Europe

16:15 - 17:00

- From arm's length principle to formulary concepts of profit distribution
- TP challenges, the value of intangibles: where we are now?
- Shareholder tax transparency standards
- Safe Harbour rules and the latest technical guidance:
  - De minimis test, Effective tax rate test and Routine profits test
- Refocus on CbCR and mandatory public disclosure
- Changes required in existing processes and methodologies for CbCR preparation and reporting
  - Update on TP documentation rules in the Europe
    - Update on DAC 6 and MDR
    - How will tax authorities respond, and how does it work in practice?

### Participants

**Eduardo Flöring** - Head of Tax, MUELLER GROUP

**Abhijay Bhatia** - Director - Transfer Pricing Operations, CONVATEC

**Andréa Massamba Leho** - Member of TPED and Transfer Pricing Specialist, BNP PARIBAS

**Andrew Thomson** - European Counsel, SULLIVAN & CROMWELL

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## Chair's Key Takeaways for Day 1

17:00 - 17:05

### Participants

**Cara Griffith** - President and CEO, TAX ANALYSTS

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## Networking Drinks Reception

17:05 - 18:05

# SCHEDULE

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10:00	10:10 - Implementation of BEPS Pillar 2: Current Developments
11:00	11:00 - Networking Break 11:30 - Pillar 2 and Qualified Domestic Minimum Top-up Taxes
12:00	12:10 - The Big Push for Transparency
13:00	13:00 - Networking Lunch
14:00	14:00 - Navigating Tax Challenges in Global Mobility
15:00	15:00 - Networking Break 15:30 - Digitalisation of Tax and VAT in the Digital Age
16:00	16:15 - Latest Updates on Transfer Pricing in the Europe
17:00	17:00 - Chair's Key Takeaways for Day 1 17:05 - Networking Drinks Reception

## Registration & Refreshments

08:30 - 09:30

## Chair's Opening Remarks

09:30 - 09:40

## Participants

**Cara Griffith** - President and CEO, TAX ANALYSTS

## Effectively Managing Disputes and Mitigating Risks

09:40 - 10:30

- Managing the transition to a complex and lengthy dispute
- Challenges of lack of continuity in the internal advisors and tax authority teams
- Managing evidence when a dispute becomes historic: record retention, access to commercial ex-employees
- Budgeting and managing the cost of a dispute
- Effective dispute resolution

## Participants

**Peter Brasted** - Global Transfer Pricing Lead, IMPERIAL BRANDS PLC

**Noah Gaoua** - Tax Director, ROCHE GROUP

**Donald Shackley** - Independent Expert & Senior Tax Interim, INDEPENDENT EXPERT

## Networking: Morning Coffee Break

10:30 - 11:00

## Lessons Learnt from Recent State Aid Controversies

11:00 - 11:50

- Practical case studies of latest tax controversies
  - Controversies involving legal mismatches, dealing at arm's length, and tax treaty abuse
- Managing reputational damage: restoring public trust after a tax dispute
- Avoiding potential controversies due to the multilateral dimensions of Pillar 2

## Participants

**Patricia Lampreave** - EU Tax Professor & EU Tax Expert, EUROPEAN PARLIAMENT

**Jan Weerth** - Group Tax, DEUTSCHE BANK

**Andrew Thomson** - European Counsel, SULLIVAN & CROMWELL

**Mariella Caruana** - Adviser, Taxation, BUSINESS EUROPE

## EU Tax Framework: New EU Tax Initiatives and their Impact on doing Business in the EU

11:50 - 12:40

- Decision-making on EU Tax Policy
- Main Drivers of EU Tax Policy
- Overview of New Tax Initiatives in the EU
- Impact on Businesses & Key Reflections for the Future of Tax

## Participants

**Mariella Caruana** - Adviser, Taxation, BUSINESS EUROPE

## Lunch Break

12:40 - 13:55

## Navigating Taxation of the Digital Economy and Unilateral Tax Measures by Country

13:55 - 14:45

- Digital economy and value creation: what if Pillar 1 fails? how should MNEs prepare requirements?
- Will we see more unilateral tax measures if Pillar 1 fails?
- How to deal with crypto assets: what are the bookings and what are the tax implications for MNEs?
- Tax control frameworks: do you even have strategic governance in place without it?
- Compliance challenges and strategies for businesses operating in the digital economy.
- Digital platform reporting: DAC 7

## Participants

**Fernando Souza de Man** - Senior Tax Manager, BOLT

**Marta Pankiv** - Senior Director, Head of Group Tax, TRICENTIS

**Nupur Jalan** - International Tax and Transfer Pricing, TRIVAGO

## Chair's Closing Remarks

14:45 - 14:50

## Afternoon Coffee and Networking Session

14:50 - 15:20

# SCHEDULE

## CONFERENCE DAY 2 - 20/09/2023

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09:00	09:30 - Chair's Opening Remarks 09:40 - Effectively Managing Disputes and Mitigating Risks
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12:00	12:40 - Lunch Break
13:00	13:55 - Navigating Taxation of the Digital Economy and Unilateral Tax Measures by Country
14:00	14:45 - Chair's Closing Remarks 14:50 - Afternoon Coffee and Networking Session