

SESSIONS

DAY ONE (DRAFT AGENDA - SUBJECT TO CHANGE) - 28/10/2021

TP Minds Africa Digital

28 - 29 October 2021

Digital Conference

Delivered GMT+2 Time Zone

Chair's Opening Remarks

09:00 - 09:10

Main Conference Stage - Day 1

Participants

Thando Rampa - Transfer Pricing Senior Manager; Johannesburg, BDO

Keynote Speech

09:10 - 09:40

Main Conference Stage - Day 1

Participants

Lee Corrick - Technical Advisor, ATAF

Networking - Lounge Break or 1:2:1 Video Meetings

09:40 - 09:55

Main Conference Stage - Day 1

Global Policy Developments Impacting TP in Africa - Policy Makers' View

09:55 - 10:40

Main Conference Stage - Day 1

Participants

Lee Corrick - Technical Advisor, ATAF

Michael Lennard - Chief, International Tax Cooperation Section, UNITED NATIONS

Cory Hillier - Senior Counsel (Tax Law), IMF

Luximan Babajee - Senior Technical Officer; Tariff and Trade Affairs Directorate (Valuation), WCO

Moderator: Joshua Bamfo - Partner & Head, Transfer Pricing Group, ANDERSEN NIGERIA

Networking - Lounge Break or 1:2:1 Video Meetings

10:40 - 10:55

Main Conference Stage - Day 1

Businesses' Ongoing Response to COVID-19 – Practical Approaches & Key Takeaways

10:55 - 11:35

Main Conference Stage - Day 1

This session will discuss the impact of the pandemic on businesses TP practices. Panellists will analyse how this brought about a shift in Arms Length Principle assumptions as a result of the disruption of global logistics and effect on production and delivery timelines, as well as increased costs of doing business and reduced productivity. We will also be examining the impact on aggregate demand and consumption patterns (effects on risk, marketplace, operational and financial risk) as well as impacts on mobility, work patterns (online work), employment patterns. The panel will also share their views on areas such as credit worthiness and access to financing. Essential attendance for all those looking for insight into best practices in the current environment.

Participants

Gareth Harrison - Head of Tax, AIRTEL AFRICA

Lydia Ndirangu - Group Head of Tax, EQUITY BANK LIMITED

Andrew Ogutu - Tax Compliance Lead - Africa, IFC - WORLD BANK GROUP

Moderator: James Karanja - Transfer Pricing Lead, Kenya, ANDERSEN

Networking - Lounge Break or 1:2:1 Video Meetings

11:35 - 11:50

Main Conference Stage - Day 1

Africa Rising: Transfer Pricing & Foreign Direct Investment for Economic Developments

11:50 - 12:30

Main Conference Stage - Day 1

Transfer pricing is more than just a tax issue, it is also a development issue. In this session, Patrick G McLennan will have a new kind of discussion – economics and the role of transfer pricing (and tax in general), private sector actors, and the public sector, in shaping Africa's future.

Participants

Patrick McLennan - Associate Director of Transfer Pricing, Cape Town, BDO

Lunch & Informal Themed Tables – Industry Focus

12:30 - 13:05

Main Conference Stage - Day 1

1. Mining & Extractive Industries table
 2. Manufacturing table
 3. Financial Services & Fintech table
 4. TMTs table
 5. Energy Table
 6. Services and Digital Services table
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African Countries' Approach to OECD's Pillar 1 and 2 – Are They Fit for Purpose?

13:05 - 13:50

Main Conference Stage - Day 1

Participants

Moderator: Joshua Bamfo - Partner & Head, Transfer Pricing Group, ANDERSEN NIGERIA

Amaka Samuel-Onyeani - Associate Director, Transfer Pricing Group, ANDERSON NIGERIA

Grant Akata - Head of Tax, TGI GROUP

Lutando Mvovo - Executive Head: International Tax, VODACOM GROUP

Alexandra Readhead - International Tax and Extractive Industries Consultant, INTERGOVERNMENTAL FORUM ON MINING AND SUSTAINABLE DEVELOPMENT

Networking - Lounge Break or 1:2:1 Video Meetings

13:50 - 14:05

Main Conference Stage - Day 1

Sustainability and Transfer Pricing - How to Future-Proof Your Policies

14:05 - 14:45

Main Conference Stage - Day 1

This session is an opportunity to hear views on sustainability and transfer pricing policies from different sectors of the business community. Following the COVID-19 pandemic, the World Economic Forum's Great Reset initiative is calling on the world to rebuild the foundations of our economic and social system. We will explore what is the Government's role in building a productive, sustainable and inclusive economy including setting transfer pricing policies and introduction of climate related law such as carbon tax. Companies now need to start preparing for new regulations around sustainability report and commit to greater transparency and accountability also in terms of transfer pricing policies. How are companies preparing for these changes? Technology has evolved from being an art to science. We will discuss how technology plays a key role and how insights gained through data can be leveraged to find exploit opportunities for sustainable processes both by Governments and Corporates.

Participants

Darlingston Talery - Commissioner, LIBERIA REVENUE AUTHORITY

Jemimah Mugo - Vice President, Head of Tax Middle East, Africa, Russia & CIS, DEUTSCHE POST DHL

Mary O' Leary - Tax Lawyer | Tax Technology Lead at Vizor | Tax & Digitalisation, VIZOR

Moderator: Kriti Velji - Transfer Pricing Expert, INDEPENDENT EXPERT

Networking - Lounge Break or 1:2:1 Video Meetings

14:45 - 15:00

Main Conference Stage - Day 1

The APAs Landscape in Africa – Current Challenges and Opportunities

15:00 - 15:40

Main Conference Stage - Day 1

Following BEPS and the recent Two Pillars developments two things are increasingly clear concerning transfer pricing disputes:

1. One-sided TP is no longer viable and as a consequence we are seeing an increasing reliance on 'two way' TP methods such as the Profit Split Method.
2. Multilateralism is increasingly crucial to the shaping of TP outcomes and this turn means bilateral mechanisms for resolving disputes are essential, whether that's via a bilateral APA or via MAP.

These two factors make APAs increasingly attractive as a tool for helping establish TP certainty in these fast changing times. This distinguished panel of industry experts brings a 'real world' industry perspective on the status of APA programmes across the continent and also looks various considerations that countries may wish to explore when developing their APA programmes. The panel achieves this by discussing a quadrant of factors that they are calling the *"Ingredients for a successful APA programme"*.

Participants

Moderator: Batanayi Katongera - TP Specialist, GLENCORE

Jeanne Havinga - Head: Transfer Pricing and Tax, STANDARD BANK GROUP

Nikki Oberholzer - Head of Tax, COCA-COLA

Nataly Marchbank - Africa Middle East Tax Director, CUMMINS AFRICA MIDDLE EAST PTY

Vineet Rachh - Vice President – Taxes, PROCTER & GAMBLE

Networking - Lounge Break or 1:2:1 Video Meetings

15:40 - 15:55

Main Conference Stage - Day 1

Revenue Authorities Feedback on Current TP Landscape & Trends

15:55 - 17:10

Main Conference Stage - Day 1

This session is an unique opportunity to give voice to representatives of African Tax Authorities on the topic of Transfer Pricing. We will come back on how the existing profit shifting mechanisms have affected their countries during the recent period and how they have adapted themselves. The panelists will explain what have changed in terms of TP policies & regulations, tools & systems, trainings and tax audit methodologies. The attendants will learn how the current trends have contributed to a reshaping of Government approach and what can be expected from Revenue Authorities in this context of rebounding global economy and renewed interest from multinational companies for Africa.

Participants

Nigeria: Israel Ajayi - Transfer Pricing, NIGERIA FEDERAL INLAND REVENUE SERVICE

Uganda: Luvuuma Robert - Manager, International Taxation, UGANDA REVENUE AUTHORITY

Zambia: Kalale Mambwe - Manager, International Taxation Unit, ZAMBIA REVENUE AUTHORITY

Liberia: Darlingston Talery - Commissioner, LIBERIA REVENUE AUTHORITY

South Africa: Johan Kruger - Senior Specialist: Transfer Pricing and International Tax, SOUTH AFRICAN REVENUE SERVICE (SARS)

Moderator: Anthony L. Assassa - Director | West Africa Region, BDO

Chair's Closing Remarks

17:10 - 17:20

Main Conference Stage - Day 1

SCHEDULE

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11:00	11:35 - Networking - Lounge Break or 1:2:1 Video Meetings 11:50 - Africa Rising: Transfer Pricing & Foreign Direct Investment for Economic Developments
12:00	12:30 - Lunch & Informal Themed Tables – Industry Focus
13:00	13:05 - African Countries' Approach to OECD's Pillar 1 and 2 – Are They Fit for Purpose? 13:50 - Networking - Lounge Break or 1:2:1 Video Meetings
14:00	14:05 - Sustainability and Transfer Pricing - How to Future-Proof Your Policies 14:45 - Networking - Lounge Break or 1:2:1 Video Meetings
15:00	15:00 - The APAs Landscape in Africa – Current Challenges and Opportunities 15:40 - Networking - Lounge Break or 1:2:1 Video Meetings 15:55 - Revenue Authorities Feedback on Current TP Landscape & Trends
16:00	
17:00	17:10 - Chair's Closing Remarks

Chair's Opening Remarks

09:30 - 09:35

Main Conference Stage - Day 2

Participants

Shazia Raviduth - Transfer Pricing and International Tax Senior Manager, BDO

What is Operational Transfer Pricing? The Challenges and How to Solve Them

09:35 - 10:20

Main Conference Stage - Day 2

The regulatory burden of transfer pricing is increasing exponentially and errors now have a significant financial statement impact. Multinational organisations have invested in enterprise resource planning (ERP) systems but these investments tend to focus only on managing the overall business and are not specific to any legal entities. ERP systems traditionally do not provide alignment of the commercial, finance and tax activities. Data lineage and financial system transparency is a key tenant of operational transfer pricing. For any transfer pricing policy implementation, ERP systems were found to be less effective when managing the transfer pricing processes and for this reason, multinationals use offline or manual workarounds and spreadsheets to set, test and monitor their intercompany price setting and accounting. The panel will explore how platform technology can remove data gathering and preparation activities from your operational transfer pricing day-to-day and provide you with control, assurance and real-time decision making power.

Participants

Marcus Botha - Director, BDO

Anna Puzone - FP&A Specialist, VENA SOLUTIONS

Networking - Lounge Break or 1:2:1 Video Meetings

10:20 - 10:35

Main Conference Stage - Day 2

Transfer Pricing Audits in Africa – Knowing Common Triggers & Defending Your TP Position

10:35 - 11:20

Main Conference Stage - Day 2

Many countries in Africa have adopted or updated transfer pricing regulations in line with the OECD Guidelines or the UN TP Model. At the same time African economies are slowly emerging from the economic and societal impacts of Covid, governments are already turning their attention to how they will close the enormous fiscal gaps that have emerged in government budgets and are looking at transfer pricing to assist with this. Our panel will be sharing their recent experiences of the developing focus, nature and conduct of TP audits and the management of international controversy, and their views as to how the environment in relation to TP controversy in Africa is likely to change over the coming years.

Participants

Moderator: Marcus Stelloh - Head of Transfer Pricing; Johannesburg, BDO

Roselle Sakhoon-Mohun - Specialist; Transfer Pricing Unit, SOUTH AFRICA REVENUE SERVICE (SARS)

Gareth Harrison - Head of Tax, AIRTEL AFRICA

Jere Tormanen - Head of Tax, BATA BRANDS

Vineet Rachh - Vice President – Taxes, PROCTER & GAMBLE

Networking - Lounge Break or 1:2:1 Video Meetings

11:20 - 11:35

Main Conference Stage - Day 2

Perspectives on Ongoing Challenges with African Comparables

11:35 - 12:15

Main Conference Stage - Day 2

Participants

Luis Carrillo - Transfer Pricing Director, MOODY'S

Rosina Shah - Manager - Tax, Sub-Saharan Africa, FEDEX EXPRESS

Networking - Lounge Break or 1:2:1 Video Meetings

12:15 - 12:30

Main Conference Stage - Day 2

Intragroup Financial Transactions

12:30 - 13:10

Main Conference Stage - Day 2

Participants

Chady Abdelnour - Senior Credit Product Specialist, S&P GLOBAL MARKET INTELLIGENCE

Lunch & Informal Themed Tables – Regional Focus

13:10 - 14:00

Main Conference Stage - Day 2

- East Africa Country Developments
- West Africa Country Developments
- North Africa Country Developments

Managing Complex Transfer Pricing Disputes & Controversy

14:00 - 14:45

Main Conference Stage - Day 2

In this panel we will discuss the issues faced by MNEs in terms of controversy in relation complex cross-border transactions. International tax enforcement landscape which has seen continued globalization of business operations, new and complex ways of doing business, a shift in public sentiment and pressure on public finances. TP has been ranked as the biggest tax risk by MNEs. Identify key complex transactions/ areas. We will explore what does this mean for cross border tax controversy strategy? Recent experiences suggests that tax authorities are increasingly adopting an approach requiring far more contextual information, greater details. Are MNEs prepared to provide comprehensive respond when detailed questions are raised. What issues are faced by corporate when dealing with authorities and other regulatory bodies in this region.

Participants

Ogaga Ologe - Finance Director, CADBURY NIGERIA

Thabiso Mohokare - Senior Tax Manager: Transfer Pricing, LIBERTY GROUP

Dr. Daniel Erasmus - Professor; Managing Director TRM Services South Africa, THOMAS JEFFERSON SCHOOL OF LAW

Moderator: Kriti Velji - Transfer Pricing Expert, INDEPENDENT EXPERT

Networking - Lounge Break or 1:2:1 Video Meetings

14:45 - 15:00

Main Conference Stage - Day 2

SESSIONS

DAY TWO (DRAFT AGENDA - SUBJECT TO CHANGE) - 29/10/2021

TP Minds Africa Digital

28 - 29 October 2021

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The Wider African Tax Landscape: Customs, VAT & Other Tax Issues

15:00 - 15:45

Main Conference Stage - Day 2

Participants

Cheikh Cisse - Head of Tax, UBA GROUP

Alison Futter - Group Tax Manager, PETRO SA

Luximan Babajee - Senior Technical Officer; Tariff and Trade Affairs Directorate (Valuation), WCO

Tantaswa Mtombeni - Chief Tax Advisor (Speaking in Personal Capacity), ESKOM HOLDINGS SOC LTD

Moderator: Dr. Daniel Erasmus - Professor; Managing Director TRM Services South Africa, THOMAS JEFFERSON SCHOOL OF LAW

Chair's Closing Remarks

15:45 - 16:00

Main Conference Stage - Day 2

SCHEDULE

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10:00	10:20 - Networking - Lounge Break or 1:2:1 Video Meetings 10:35 - Transfer Pricing Audits in Africa – Knowing Common Triggers & Defending Your TP Position
11:00	11:20 - Networking - Lounge Break or 1:2:1 Video Meetings 11:35 - Perspectives on Ongoing Challenges with African Comparables
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13:00	13:10 - Lunch & Informal Themed Tables – Regional Focus
14:00	14:00 - Managing Complex Transfer Pricing Disputes & Controversy 14:45 - Networking - Lounge Break or 1:2:1 Video Meetings
15:00	15:00 - The Wider African Tax Landscape: Customs, VAT & Other Tax Issues 15:45 - Chair's Closing Remarks