

Chair's Opening Remarks

09:00 - 09:10

Main Conference Stage

Keynote Address from the OECD

09:10 - 09:30

Main Conference Stage

Participants

Tomas Balco - Head of Transfer Pricing Unit, OECD

Keynote Address from the RFB

09:30 - 09:50

Main Conference Stage

Participants

Claudia Pimentel - Coordinator-General of Taxation, FEDERAL REVENUE SECRETARIAT OF BRAZIL

Latest Developments from LATAM Policy Makers

09:50 - 10:40

Main Conference Stage

Hear from the policy makers on the latest major tax and transfer pricing legislation and guidelines, updates on Brazil joining the OECD standard and efforts towards greater collaboration.

Participants

Claudia Pimentel - Coordinator-General of Taxation, FEDERAL REVENUE SECRETARIAT OF BRAZIL

Fernando Becerra O'Phelan - Manager of Transfer Pricing Operations, SUNAT

Tomas Balco - Head of Transfer Pricing Unit, OECD

Davi Santana de Jesus - Partner - International Transfer Pricing, BASEFIRMA

Morning Coffee

10:40 - 11:00

Main Conference Stage

BEPS Pillars 1&2 and Financial Transactions - In a Brazilian Context

11:00 - 11:50

Main Conference Stage

The OECD's update and proposals on Pillars 1 & 2 have had huge implications for MNEs globally - how does it apply to Brazilian MNEs in the stage we are currently at with joining the guidelines?

Participants

Joao Cabral - Head of Tax - International Markets, BRF

Fernanda Amaral - Tax & Transfer Pricing, LOUIS DREYFUS COMPANY

Marcelo Fonesca Vicentini - Partner, MARDONA LAW

How are South American MNE's Responding to the Transition out of COVID?

11:50 - 12:40

Main Conference Stage

With the economies everywhere recovering from the economic implications of the pandemic, our expert panel will discuss how Brazilian MNE's are managing tax planning, operations, expansion, and more in 2022 and beyond.

Participants

Sergio Guardia - Gerente Tributário para a América Latina, AKZONOBEL

Alexandre Presswell Sandoval - Director - Tax, Accounting and Treasury, NOVO NORDISK

Erica Morena - Gerente Tributário, THE AES CORPORATION

Eduardo Goldszal - Head of Transfer Pricing, MEER TAX

Danielle Pinho - Tax Director, NOVARTIS BRASIL

Lunch

12:40 - 13:40

Main Conference Stage

Panama Tax Administration vs Petroleum Wholesale Corp

13:40 - 14:30

Main Conference Stage

Using the recent ruling in Panama, where the tax authority issued the largest adjustment in history, we'll explore what can happen when multinationals and tax authorities use different technology solutions. This session will focus on the challenges of comparables and the importance of reliable external data sources.

This session will help you:

- Understand how tax jurisdictions use technology
- Learn more about the taxation of multinational activity
- Find out about technology and resources to support your transfer pricing strategy

Participants

Luis Carrillo - Transfer Pricing Director, BUREAU VAN DIJK

Jose Galindez - Transfer Pricing and International Tax, GALINDEZ, MEDRANO Y ASOCIADOS

The Current Litigation Climate in Brazil

14:30 - 15:20

Main Conference Stage

Our expert panel will be going over some of the most important cases from Brazil, the RFB's stance and their implications, as well as how the litigation climate and decisions could change in the future with new standards being introduced.

Participants

Virginia Tavares - Head of Tax - Brazil, SANOFI

Bruna Cardoso Salles - Tax Counsel, GRUPO JBS

Valeria Monho Bendazolli Carvalho - LATAM Tax and Legal Director, PIRELLI

Prof. Dr. Luís Flávio Neto - Professor, IBDT

Thiago Glucksmann - Partner, BISMARA & GLUCKSMANN TAX LAW FIRM

SESSIONS

MAIN CONFERENCE - 01/12/2021

TP Minds Brazil

1 - 2 December 2021

Digital Conference

BRT – Brasilia Time (UTC-3h)

Will Brazil Introduce APA's?

15:20 - 16:10

Main Conference Stage

While the RFB permits mutual agreement procedures, APA's have never been granted. Are APA's now on the cards in order for Brazil to join the OECD standard?

Participants

Gustavo Machado - Tax Manager, ASTRA ZENECA

Alexandre Presswell Sandoval - Director - Tax, Accounting and Treasury, NOVO NORDISK

Eduardo Goldszal - Head of Transfer Pricing, MEER TAX

Marcio Oliveira - Professor & GETAP TP Counselor, FUCAPE BUSINESS SCHOOL AND IBMEC

Chair's Closing Remarks

16:10 - 16:20

Main Conference Stage

SCHEDULE

MAIN CONFERENCE - 01/12/2021

TP Minds Brazil

1 - 2 December 2021
Digital Conference
BRT – Brasilia Time (UTC-3h)

TIME	MAIN CONFERENCE STAGE
09:00	09:00 - Chair's Opening Remarks 09:10 - Keynote Address from the OECD 09:30 - Keynote Address from the RFB 09:50 - Latest Developments from LATAM Policy Makers
10:00	10:40 - Morning Coffee
11:00	11:00 - BEPS Pillars 1&2 and Financial Transactions - In a Brazilian Context 11:50 - How are South American MNE's Responding to the Transition out of COVID?
12:00	12:40 - Lunch
13:00	13:40 - Panama Tax Administration vs Petroleum Wholesale Corp
14:00	14:30 - The Current Litigation Climate in Brazil
15:00	15:20 - Will Brazil Introduce APA's?
16:00	16:10 - Chair's Closing Remarks

SESSIONS

MAIN CONFERENCE - 02/12/2021

TP Minds Brazil

1 - 2 December 2021
Digital Conference
BRT – Brasilia Time (UTC-3h)

Chair's Opening Remarks

10:00 - 10:10

Main Conference Stage

Application of TP Standards in Different Sectors

10:10 - 11:00

Main Conference Stage

Join our panel representing through their experience a multitude of industries as they discuss the application of TP standards in different sectors, and how new TP legislation could be interpreted per major industries.

Participants

Luiz Guilherme de Medeiros Ferreira - Head of Tax, IBM

Bruno Fonti - Manager - Direct Tax and International Taxation, PETROBRAS

Marilia Zingari Rocholli Granjeiro - LATAM Tax Manager, NOVO NORDISK

Danielle Pinho - Tax Director, NOVARTIS BRASIL

Alba Sanchez - Assistant Director, Global Tax, MOODY'S

Considerations for Filing and Reporting in Brazil

11:00 - 11:50

Main Conference Stage

Being 'audit ready' in Brazil has never been more important, with major stakeholders from outside the jurisdiction playing a greater role in Brazils economy. Join this panel to hear how domestic and foreign businesses should be preparing for year end.

Participants

Ivan Ferreira - Diretor Tributário e Aduaneiro, SIEMENS

Priscilla Ribeiro - Tax Manager, WARNER MEDIA

Davi Santana de Jesus - Partner - International Transfer Pricing, BASEFIRMA

Diana Mogollon - Partner, BASEFIRMA

Tax & Operational Transformation in the LATAM Region

11:50 - 12:40

Main Conference Stage

Operational Tax and new technologies have been ever growing around the world automating and revolutionizing tax teams - but how are new innovations affecting Brazilian and LATAM MNE's? What is permitted, and how are tax teams growing and becoming more efficient and managing risk internally?

Participants

Augusto Flores - Head of Corporate Tax, VOLVO

Meily Franco - Tax Director LATAM, ALSTOM GROUP

Lionel Nobre - VP Latin America Tax, DELL

Lunch

12:40 - 13:40

Main Conference Stage

Challenges of Taxing the Digital Economy

13:40 - 14:30

Main Conference Stage

Participants

Priscilla Ribeiro - Tax Manager, WARNER MEDIA

Nathalia Brandao - Global Tax Director, HOTMART

Phelip Mendes Antonio - VP of Finance, CHEESECAKE LABS

Moderator: Juliana França Lourenço Zobarán - LATAM Tax Director, TECHNICOLOR

Permanent Establishments and Implications for Double Taxation

14:30 - 15:20

Main Conference Stage

Participants

Mario Agnese - International Tax Senior Manager, BP

Juliana França Lourenço Zobarán - LATAM Tax Director, TECHNICOLOR

Debora Talutto - Senior Tax Manager, VERITAS

Chair' Closing Remarks and Close of Conference

15:20 - 15:30

Main Conference Stage

SCHEDULE

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13:00	13:40 - Challenges of Taxing the Digital Economy
14:00	14:30 - Permanent Establishments and Implications for Double Taxation
15:00	15:20 - Chair' Closing Remarks and Close of Conference