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### Registration and Coffee

08:30 - 09:00

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### Chair's Opening Remarks

09:00 - 09:15

### Participants

**Brad Rolph** - National Practice Leader; Transfer Pricing, GRANT THORNTON

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### Tax Administration Challenges in a Crisis and Opportunities For the Future

09:15 - 09:45

### Participants

**Alexandra MacLean** - Director General of International and Large Business Directorate, CANADA REVENUE AGENCY

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### What's Next for BEPS 2.0 And The Digital Economy

09:45 - 10:45

- OECD progress on a digital tax agreement for 2021
- Canadian and US perspectives.
- Impact of unilateral measures and tax uncertainty

### Participants

**Abhishek Shah** - Indirect Tax Head, Americas, CATERPILLAR

**Warren Novis** - Senior Manager, Transfer Pricing, OPENTEXT

**Norman Wingen** - Adviser - Transfer Pricing, OECD

**Blair Vokey** - Manager, International Advisory Services, Internal Tax Division, CANADA REVENUE AGENCY

**Moderator: Lori Whitfield** - Tax Partner, GRANT THORNTON

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### Morning Coffee

10:45 - 11:05

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### Operational Excellence in Transfer Pricing

11:05 - 12:00

- Considerations related to how the TP function should evolve along with business growth, the increasing complexities in TP compliance and audit requirements, and the increasing interconnectivity needed between TP and other tax, finance and business functions.
- Best practices for managing the TP function throughout the TP lifecycle, including procedures and controls for each of the phases of planning, implementation, documentation and defense.

### Participants

**Peter Kurjanowicz** - Partner, Transfer Pricing, GRANT THORNTON

**Karen Salisbury** - Principal, GRANT THORNTON

**Paul Sutton** - Co-Founder, LCN LEGAL

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### Lunch

12:00 - 13:00

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### Global Policy Perspectives on the TP Landscape

13:00 - 14:00

How are the international organizations and tax authorities addressing transfer pricing and the evolving international tax landscape?

### Participants

**Alexandra MacLean** - Director General of International and Large Business Directorate, CANADA REVENUE AGENCY

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

**John Hughes** - Senior International Advisor to the Treaty and Transfer Pricing Operations, IRS

**Moderator: Brad Rolph** - National Practice Leader; Transfer Pricing, GRANT THORNTON

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### Managing Tax Policy Developments and Audit Recommendations

14:00 - 15:00

- How can multinationals prepare for how tax authorities are approaching BEPS in Canada and other tax jurisdictions?
- What are the global trends for revenue authorities and their approach to audits?
- How should multinationals deal with more aggressive tax authorities worldwide?

### Participants

**Anna Garbaczewska** - Director, ROYAL BANK OF CANADA

**Claire Kellow** - Director, Tax, TEVA CANADA

**Rowena Mulholland** - Director Transfer Pricing, OPENTEXT

**Paul Sutton** - Co-Founder, LCN LEGAL

**Moderator: Roderik Vehmeijer** - Partner, GRANT THORNTON

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### Afternoon Coffee

15:00 - 15:20

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### MAPs and APAs – Lessons from the Past and What to Expect Going Forward

15:20 - 16:20

- When to choose APAs for alternative dispute resolution
- What to do when the APA or MAP process gives the wrong answer
- How COVID developments may affect APA outcomes
- Potential implications of the US Coca Cola decision on MAP and APA negotiations

### Participants

**Richard Gilmer** - Manager, Audits and Tax Planning, NOVA CHEMICALS CANADA

**Glen Arnelien** - Tax Director, NOV CANADA ULC

**Clark Armitage** - Member, CAPLIN & DRYSDALE

**Dale Hill** - Partner, GOWLINGS WLG CANADA

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### Chair' Closing Remarks and Drinks Reception

16:20 - 16:40

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# SCHEDULE

MAIN CONFERENCE DAY 1, EST TIME ZONE - 23/02/2021

TP Minds Canada Digital

February 23 - 24, 2021

Digital Conference

Eastern Standard Time (EST) GMT/UTC-5

TIME	
08:00	08:30 - Registration and Coffee
09:00	09:00 - Chair's Opening Remarks 09:15 - Tax Administration Challenges in a Crisis and Opportunities For the Future 09:45 - What's Next for BEPS 2.0 And The Digital Economy
10:00	10:45 - Morning Coffee
11:00	11:05 - Operational Excellence in Transfer Pricing
12:00	12:00 - Lunch
13:00	13:00 - Global Policy Perspectives on the TP Landscape
14:00	14:00 - Managing Tax Policy Developments and Audit Recommendations
15:00	15:00 - Afternoon Coffee 15:20 - MAPs and APAs – Lessons from the Past and What to Expect Going Forward
16:00	16:20 - Chair' Closing Remarks and Drinks Reception

# SESSIONS

MAIN CONFERENCE DAY 2, EST TIME ZONE - 24/02/2021

TP Minds Canada Digital

February 23 - 24, 2021

Digital Conference

Eastern Standard Time (EST) GMT/UTC-5

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## Registration and Coffee

08:30 - 09:10

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## Chair's Opening Remarks

09:10 - 09:20

## Participants

**Brad Rolph** - National Practice Leader; Transfer Pricing, GRANT THORNTON

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## View from the Bench

09:20 - 09:50

- How are the Canadian courts approaching transfer pricing cases?
- The complexities of transfer pricing cases from a judiciary perspective
  - Approaches that can assist the court

## Participants

**Frank Pizzitelli** - Judge, TAX COURT OF CANADA

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## Implications of Cameco/Agracity on Canadian TP Landscape

09:50 - 10:50

- Lessons learned from the Tax Court
- Impact of current audits and disputes:
  - Canadian form over substance versus OECD's BEPS approach
  - Informal recharacterizations
- International cases making headlines
- Upcoming cases

## Participants

**Sebastien Rheault** - Partner, BARSALOU LAWSON RHEAULT

**Claire Kellow** - Director, Tax, TEVA CANADA

**Justin McGough** - Director of Tax Planning, 3M

**Moderator: Brad Rolph** - National Practice Leader; Transfer Pricing, GRANT THORNTON

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## Morning Coffee

10:50 - 11:10

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## Tax Transformation and Disruptive Technologies

11:10 - 12:10

- Tax Forecasting and what-if scenarios
- Sector and Market Jurisdiction Forecasting
- Designing a successful tax technology strategy
- Initiating and managing transition
- Tax of the Digital Economy
- European Tax Updates

## Participants

**Joy Harper** - Senior Tax Manager - Treasury, GOOGLE

**Neil Chander** - VP, Tax, QUADREAL

**Soorashree Sadekar** - Associate Director, AIG

**Moderator: Ketan Patel** - Global Head of Tax Technology, MORGAN STANLEY

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## Lunch

12:10 - 13:10

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## Afternoon Keynote from the OECD

13:10 - 13:40

## Participants

**Norman Wingen** - Adviser - Transfer Pricing, OECD

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## Duties, Customs and Global Trade

13:40 - 14:30

## Participants

**George Georgiev, Ph.D.** - Senior Director, Transfer Pricing and Economic Analyses, SIEMENS

**Brad Rolph** - National Practice Leader; Transfer Pricing, GRANT THORNTON

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## Afternoon Coffee

14:30 - 15:00

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## IP and Intangibles

15:00 - 15:50

- TP planning under evolving guidance
  - Acquisitions, integrations and operational issues
  - Value creation, DEMPE analyses and documentation in the face of aggressive tax audits
  - IP Valuations
  - Locating IP and R&D hubs
- Pricing intangibles in bundled transactions
  - Hardware and services
  - BEAT and Nexus considerations
- Marketing intangibles
  - Reviewing TP approaches for sales entities
  - Current cases and tax authority challenges

## Participants

**George Georgiev, Ph.D.** - Senior Director, Transfer Pricing and Economic Analyses, SIEMENS

**Brian Kenny** - International Tax Director, DELL

**Lucia Fedina** - Director, Transfer Pricing, CBRE

**Kyle Bunnell** - Senior Manager, Tax and Treasury, HOOTSUITE

**Moderator: Glen Haslhofer** - Principal, GRANT THORNTON

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## Permanent Establishments

15:50 - 16:40

- Managing cross-border challenges and PE Risk
- PEs and the digital economy
- Clarification on PEs and criteria

## Participants

**Yan Reznikov** - Global International Tax & Transfer Pricing, VICTAULIC

**Keith Brockman** - VP Global Tax, WELBILT

**Shemara Watts** - Senior Tax Manager, KGHM

**Moderator: Sebastien Rheault** - Partner, BARSALOU LAWSON RHEAULT

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## Chair' Closing Remarks and Close of Conference

16:40 - 17:00

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# SCHEDULE

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14:00	14:30 - Afternoon Coffee
15:00	15:00 - IP and Intangibles 15:50 - Permanent Establishments
16:00	16:40 - Chair' Closing Remarks and Close of Conference