

Transfer Pricing Challenges for MNEs: compass for the next future

24-26 February 2020, Amsterdam



Amsterdam, 25-26 February 2020

Nexia Global Transfer Pricing Conference

“Transfer Pricing Challenges for MNEs: compass for the next future”

Transfer pricing has become a hot topic for Governments and Revenues due to globalized economy and international actions fostered by public institutions like the OECD and the United Nations to face tax avoidance and aggressive tax planning. Accordingly, for the sustainability and success of their businesses, multinational enterprises have to proactively manage the topics.

Meanwhile, discussions concerning Pillar 1 and Pillar 2 together with specific topics like financial transactions, profit split and disclosure requirements will contribute in shaping the new international tax landscape and tax paradigm for the future.

The conference starts with a drinks reception on the 24 February at the Skylounge South in the DoubleTree by Hilton Centraal hotel, at 18:00. The reception will be hosted by our Nexia Dutch member firms.

Conference agenda

Tuesday 25 February

Time	Topic	Speakers/Participants
08.15-09.00	Registrations & Coffee	
09.00-09.30	Welcome & Opening Comments	Maulik Doshi (Nexia TP Business Group Leader)
	Chair of the day	Fabian Duss (ADB Altorfer Duss & Beilstein AG)
09.30-10.15	Keynote Address	Anuschka Bakker (IBFD, Head of TP Unit)
	Changing Global Transfer Pricing Landscape and update on OECD plans	
10.15-11.00	Panel discussion: ask the policymakers <ul style="list-style-type: none"> • Future of ALP • The position of non-OECD aligned countries • CCCTB and Transfer Pricing • Pillar 1 and Pillar 2 	Moderator: Catarina Breia (Nexia Santos Carvalho) Panel of participants: <ul style="list-style-type: none"> ▪ Michael Lennard (United Nations) ▪ Anuschka Bakker (IBFD, Head of TP Unit) ▪ Christian Zimmermann (Ebner Stolz)
11.00-11.15	Morning Refreshments	
11.15-12.00	Taxation of Digital Economy – Recent updates and way forward	Maulik Doshi (SKP Group)
12.00-13.00	Panel discussion: the impact of Digital Economy on business structuring <ul style="list-style-type: none"> • Operational aspects • Tax implications • Management of transition periods 	Moderator: Benno Lange (DHPG) Panel of participants: <ul style="list-style-type: none"> ▪ Nadia Konkel (Körber AG) ▪ Eduardo Flöring (Müller Group) ▪ James Nethersole (Nexia Sydney)
13.00-14.00	Lunch	
14.00-14.45	Financial Transactions – TP landscape and outlook	Anuschka Bakker (IBFD, Head of TP Unit)

*Agenda remains subject to amendments. Times are indicative only.

14.45-15.45	Panel discussion: managing intra-group financing <ul style="list-style-type: none"> • Sourcing of funds • Loans • Cash-pooling • Guarantees 	Moderator: Catarina Breia (Nexia Santos Carvalho) Panel of participants: <ul style="list-style-type: none"> ▪ Giacinto Valenti (Unicredit, Head of TP) ▪ Jens Binding (Credit Suisse - Vice President Tax) ▪ Eduardo Flöring (Müller Group) ▪ Glen Wei (Chung Rui Tax Group)
15.45-16.15	Afternoon Refreshments	
16.15-17.00	Panel discussion: AI and the role of technology in managing transfer pricing work <ul style="list-style-type: none"> • MNE appetite for AI • Managing the automation of TP processes • Practical issues 	Moderator: Christian Zimmermann (Ebner Stolz) Panel of participants: <ul style="list-style-type: none"> ▪ Nikita Bogdanov (Bureau van Dijk) ▪ Lennart van den Kommer (Reptune) ▪ Eduardo Flöring (Müller Group)
17.00-17.30	How to conduct benchmarking analyses	Bureau van Dijk
17.30	Closing Remarks for Day 1	Benno Lange (DHPG)

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Wednesday 26 February

Time	Topic	Speakers/Participants
08.15-09.00	Registrations & Coffee	
	Chair of the day	Marc Derks (Horlings Nexia)
09.00-09.45	Hard to Value Intangibles: revised strategies for IPs developments and exploitation	Kathryn Rice (Cohn Reznick)
09.45-10.30	Transfer Pricing and custom valuation: state of the art and possible convergences	Luximan Babajee (World Customs Organization)
10.30-11.10	Permanent Establishments and TP Exposure	Gian Luca Nieddu (Hager&Partners)
11.10-11.30	Morning refreshments	
11.30-12.15	Panel: challenges of business restructuring in a post-BEPS world	Moderator: Rajesh Sharma (Smith & Williamson) Panel of participants: <ul style="list-style-type: none"> ▪ Luximan Babajee (World Customs Organization) ▪ José de Almeida Fernandes (The Navigator Company) ▪ Anuschka Bakker (IBFD, Head of TP Unit)
12.15-13.00	Panel discussion: maintaining group-wide TP Documentation – Challenges & Strategies <ul style="list-style-type: none"> • Local requirements and timing: resources and processes • Different Tax Administrations' perspectives • Role of in-house and external consultants 	Moderator: Dawn Ross (Saffery Champness) Panel of participants: <ul style="list-style-type: none"> ▪ André Neumann (Röchling Group) ▪ Eduardo Flöring (Müller Group) ▪ Fabian Andres Romero (Nexia Montes & Asociados) ▪ Amol Haryan (Chaturvedi & Shah)
13.00-14.00	Lunch	

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14.00-14.45	Tax Inspections and Transfer Pricing	Marco Carrozzino (Guardia di Finanza - Italian Tax Administration) ¹
14.45-15.45	Panel discussion: managing the TP risk in a post BEPS World <ul style="list-style-type: none"> • The role of TP documentation • Disclosure requirements (CbCR, DAC6, tax rulings) • TP Audit Experiences • APAs, domestic litigation and MAPs 	Moderator: Maulik Doshi (SKP Group) Panel of participants: <ul style="list-style-type: none"> ▪ Daniela Steierberg (Nordex SE) ▪ Jens Binding (Credit Suisse - Vice President Tax) ▪ Holger Mach (Ebner Stolz) ▪ Gian Luca Nieddu (Hager&Partners)
15.45	Vote of Thanks and Closing Comments	Maulik Doshi

¹ The speech is held in a personal capacity and does not bind the Italian Tax Administration in any way.

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