



The 2010 update to the OECD Model Convention and the revised Transfer Pricing guidelines

Amsterdam, 19 November 2010

Amsterdam Centre for Tax Law (ACTL)

www.jur.uva.nl/actl

Venue: Royal Netherlands Academy of Arts and Sciences

Chair: Dennis Weber (ACTL/Loyens & Loeff)

On 22 July 2010, the OECD Council approved the amendments to the Model Tax Convention and the Transfer Pricing Guidelines. The Amsterdam Centre of Tax law (ACTL) of the University of Amsterdam (UvA) is organising a seminar which will gather both OECD representatives as well as experts from across Europe to debate the relevant updates. Topics to be discussed include the attribution of profits to PE, tax treaty entitlement of CIV, income from employment, the revised Transfer Pricing guidelines and sovereign wealth funds.

Speakers and moderators

- Walter Andreoni (Maisto e Associati)
- Mary Bennett (Head of OECD Tax Treaty & Transfer Pricing Division)
- Rob Cornelisse (ACTL/Loyens & Loeff)
- Harmen van Dam (Loyens & Loeff)
- Stijn Janssen (Loyens & Loeff Dubai)
- Guglielmo Maisto (Catholic University of Piacenza/Maisto e Associati)
- Otto Marres (ACTL/ KPMG Meijburg)
- Johann Muller (Head of tax risk management Maersk)
- Hans Pijl (Deloitte)
- Frank Pötgens (Free University Amsterdam/Brauw Blackstone Westbrook)
- Antonio Russo (Baker & Mckenzie)
- Caroline Silberztein (Head of OECD Transfer Pricing Unit)
- Bruno da Silva (ACTL/Tax Treaty advisor Macau)
- Ton Stevens (Erasmus University/Loyens & Loeff)
- Hein Vermeulen (ACTL/PwC)
- Peter Wattel (ACTL/Netherlands Supreme Court)
- Dennis Weber (Director ACTL)
- Stef van Weeghel (ACTL/PWC)

For more info visit our website: www.jur.uva.nl/actl (*under events*)

This seminar is supported by:

The 2010 update to the OECD MC and the revised Transfer Pricing guidelines

Amsterdam, 19 November 2010

Amsterdam Centre for Tax Law (ACTL)

www.jur.uva.nl/actl

Venue: Royal Netherlands Academy of Arts and Sciences

- 8.00 - 9.00** **Registration/Coffee**
- 9.00 – 9.05** **Opening**
- Dennis Weber/Chair (ACTL)
- 9.05 – 9.30** **The 2010 OECD MC amendments and the revised TP guidelines: an overview**
- Stef van Weeghel (ACTL/PwC)
- 9.30 – 11.00** **The new Art. 7 of the OECD MC: attribution of profits to PE**
(Peter Wattel; ACTL/Netherlands Supreme Court)
- Mary Bennett (Head of OECD Tax Treaty & Transfer Pricing Division)
- Johann Muller (Head of tax risk management Maersk)
- Hans Pijl (Deloitte)
- 11.00 – 11.30** **Break**
- 11.30 – 13.00** **Tax Treaty entitlement of CIVs**
(Rob Cornelisse; ACTL/Loyens & Loeff)
- Ton Stevens (Loyens & Loeff/Erasmus University)
- Bruno da Silva (ACTL/Tax treaty advisor Macau)
- Hein Vermeulen (PWC/ACTL)
- 13.00 – 14.00** **Lunch**
- 14.00 – 15.00** **Income from Employment**
(Otto Marres; ACTL/KPMG Meijburg)
- Frank Pötgens (Free University of Amsterdam; Brauw Blackstone Westbroek)
- Walter Andreoni (Maisto e Associati)
- 15.00 – 16.30** **The revised Transfer Pricing guidelines**
(Stef van Weeghel; ACTL/PwC)
- Caroline Silberztein (Head of OECD Transfer Pricing Unit)
- Antonio Russo (Baker & McKenzie)
- Harmen van Dam (Loyens & Loeff)
- Guglielmo Maisto (Maisto e Associati)
- 16.30 – 16.45** **(short) break**

16.45 - 18.00 **Sovereign wealth funds**
(Dennis Weber; ACTL/Loyens & Loeff)
- Stijn Janssen (Loyens & Loeff Dubai)
- Stef van Weeghel (ACTL/PwC)

Venue
Koninklijke Nederlandse Academie van Wetenschappen (KNAW)
Het Trippenhuis
Kloveniersburgwal 29
1011 JV Amsterdam
www.knaw.nl