



TAX EXECUTIVES INSTITUTE, INC.

The preeminent association of tax professionals worldwide

TEI EMEA Chapter

15th Anniversary Conference agenda

Generation 2030 – Tax in the Public Eye

Thursday 11- Friday 12 June 2015
Starling Hotel, near PalExpo / Geneva Airport

Agenda – Day One, 11 June 2015

07.00 – 18.00 ***Registration***

08.00 – 09.00 ***Welcome Coffee***

8:15 - 8.45 Introduction to TEI for new members

Rudolf van Ooijen – TEI EMEA Chapter president

9.00 – 12.15 US international tax principles – *direct tax*

This session focuses on the following topics:

- Development of International Tax Law & Policy
- Sourcing of Income & Expense
- Foreign Tax Panorama – Foreign Tax Credit
- Earnings & Profits
- Subpart F
- Inbound/Outbound Transactions – Section 367(a) & (b)
- Overview of Section 482 (Transfer Pricing)
- Documentation and Foreign Reporting from Foreign Affiliates
- Bringing It All Together: Structuring of Foreign Transactions & Operations to Minimize the Corporate Tax Burden

Speakers:

- Dan Berman
- Josh Johnson
McGladrey

9.00 – 10.30 Managing Indirect Tax Risk

Speaker:

Pierre Prod'hom
Python & Peter

10.00 – 11.00 **Break**

11.00 – 12.15 US Sales Tax Principles

Speaker:

Maria Todorova
Sutherland Asbill and Brennan

12.15 – 13.30 **Lunch** sponsored by  TPA Global

13.30 – 14.00 Welcome

- Rudolf van Ooijen – TEI EMEA Chapter president
- Eli Dicker, TEI Executive Director

14.00 – 15.30 Tax Policy – who is stirring the Tax Policy pot?

International tax policy is no longer the exclusive remit for each country alone.

A panel session on the changing dynamics related to Tax Policy. What has changed? What is still to come: what are the plans of the OECD, UN and EU? What does it take to be compliant?

Panelists:

- Michael Lennard, Chief International Tax Cooperation, United Nations
- Prof. Kees van Raad, International Tax Center, Leiden
- Bartjan Zoetmulder, Partner Loyens & Loeff
- Hans Mooij, The TRIBUTE initiative
- Giles Parsons, Director European tax Policy, Caterpillar

15.30 -16.00 **Break**

16.00 – 17.30 The new tax director

The role of the tax director has changed dramatically over the last few years. What are the requirements on tax executives going forward; what skill sets are needed? How to secure compliance in a constantly changing environment? How to communicate on taxes, internally as well as externally?

Speakers:

- Antonio Maturo, Spencer Stuart Geneva
- Wim Wuyts, Head of Tax, Bekaert
- Bo Iversen, Head of Tax, UCB
- CFO/Board Member TBD

17.30 – 18.30 **Free Time**

18.30 Assemble for transfer to Dinner – Lobby/Entrance

18.45 Depart for Dinner

19.15 – 20.15 Cocktail

20.30 – 23.00 Dinner at Domaine de Penthes,

Sponsored by  LOYENS LOEFF

23.00 Return by bus to Starling Hotel

Agenda – Day Two, 12 June 2015

08.00 – 16.00 **Registration**

08.00 – 08.45 **Welcome Coffee**

8.45 – 9.00 Welcome

Mark Silbiger, TEI International President; Director of Tax at the Lubrizol Corporation

9.00 – 10.45 Supply chain structures – the past, present and future

“Mobilising income” was the theme of the first TEI EMEA Conference. A lot has changed since then.

The primary objective of the session is to focus on the practical impact on existing and future supply chain structures, defending current models and managing the transition to the post-BEPS framework.

The panel will highlight the implications of BEPS and other initiatives, so that participants will know how to approach the question “What will in-house managers need to focus on in 2016 and 2017, and do differently from today?” In other words, how will existing models be reassessed, and what do we need to do to minimise the consequences of that reassessment, whether from a technical or operational perspective?

Panelists:

- Carl Bellingham, Leader, Value Chain Transformation, PWC Switzerland
- John Henshall, Leader, Business Model Optimisation, Deloitte-UK
- Fredrik Hedlund, SVP Finance, Nielsen
- Fabio de Angelis, International Tax Director, Philip Morris
- Iain Maclean, Formerly VP Taxes, Tetra Laval

10.30 -11.00 **Break**

11.00 – 12.30 Break-out session Direct tax – Managing controversy

During this session, we will address transfer pricing topics, Country-by-Country reporting, and controversy management, particularly multi-party audits.

Panelists:

- Johann Muller, tax adviser, previously in-house tax professional at Maersk and Chief Adviser at Danish Competent Authority
- Peter Nias, Counsel, Pump Tax Chambers, London

11.00 – 12.30 Break-out session Indirect tax – Key trends and changes in Customs

This break-out session will discuss the key developments in Customs and international trade, namely in the context of the new Union Customs Code that becomes applicable in 2016.

Speaker:

Fernand Rutten, Deloitte - Global Leader Customs and Global Trade practice

12.30 – 13.30 **lunch** - sponsored by **LENZ & STAEBELIN**

13.30 – 14.00 Switzerland – weathering the storm

Speaker:

Mr Christoph Schelling, Head of Tax Division, SIF, Swiss Federal Department of Finance

14.00 – 15.30 Break-out session Direct Tax: Tax reforms – one size fits all?

This break-out session will discuss perspectives on tax reform after BEPS, US, EU and Switzerland.

Speakers:

- Prof. Dr. Robert J. Danon, University of Lausanne
- An Theeuwes, Tax Policy Manager, Shell International
- Others to be confirmed

14.00 – 15.30 Break-out session Indirect Tax: VAT Fraud – Impact on Businesses

This break-out session will address the issue of Fraud in Indirect Tax, namely its influence on ECJ cases and its impact on Businesses.

Speaker:

Redmar Wolf, Baker & McKenzie Amsterdam and Professor Indirect Taxes at VU University Amsterdam

15.30 – 16.00 Closing remarks and send-off

Rudolf van Ooijen – TEI EMEA Chapter president