

24<sup>th</sup> & 25<sup>th</sup> November 2016

BERLIN, GERMANY

UNIGLOBAL

# 3RD ANNUAL CORPORATE TAX SUMMIT

Reshaping the Tax Function of the Future

## SPEAKERS

### GEORG BERKA

Head of International Tax  
Raiffeisen Bank, Austria

### HARM J. OORTWIJN

Director International Tax  
Paramount, Netherlands

### EVELYN ARNOLD

Head of Tax and Finance  
Zurich Insurance Group, Germany

### SOPHIA REISMANN

Tax Expert – Global TP  
OMV, Austria

### ZAHIRA QUATTROCCHI

Group Tax Director  
Barilla, Italy

### RODERICK SAYERS

Group Head of Tax  
Petrofac Services Limited, UK

### GIUSEPPE NATALI

Head of International Tax  
Autostrade per l'Italia, Italy

### ANDREA LEE

Head of Desk Transfer Pricing  
Erste Group Bank AG, Austria

### DR. ADOLF W POINDL

Group Head of Tax  
Megatech Industries AG, Austria

### BARTJAN ZOETMULDER

Tax partner, Loyens & Loeff  
Dutch Tax Bar Association,  
Netherlands

### RAFFAELE PETRUZZI

Managing Director  
WU Transfer Pricing Center, Austria

### KONSTANZE WEBER

Head of Tax Planning and Tax Regions  
Far East/Europe  
Beiersdorf AG, Germany

### SPEAKER TBA

Bureau van Dijk, Germany

### BARBARA TRIBERTI

Direct Tax Manager  
Vodafone, Italy

### FEDERICA PITRONE

International Taxation  
Banca Intesa SanPaolo, Italy

### PIERO BONARELLI

Head of International Tax Affairs  
UniCredit, Italy

### DR. CLEMENS NOWOTNY

Partner, Tax Advisor  
LeitnerLeitner, Austria

### IVELINA GEORGIEVA

Transfer Pricing Manager  
Carlsberg, Germany

### JD CHOI

Chief Executive Officer  
Tax Technologies, Inc. USA

Testimonials from our previous Corporate Tax Summit

19th and 20th November, Vienna

"It was very satisfactory experience and great for my networking"

Tax Manager, BRF Foods GmbH, Austria

"Good panel of speakers and high level of presentations"

Group Tax Manager, FERRERO, Luxembourg

"Very interesting presentations and talks with other participants"

Head of Accounting & Tax UBIMET, Austria

"Very good organized, presenters with good tax background, themes relevant to actual tax issues and problems"

Global Tax Advisor, DELL, Slovakia

"Very good experience, a lot of opportunity for networking, practical insight"

Director European Tax, Electronic Arts, Switzerland

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**08:30 Registration & morning coffee****08:50 Welcome & opening remarks from the Chairman****KEYNOTE ADDRESS****09:00 The changing role of the tax function in an environment demanding increased tax transparency**

- Why the demand for increased tax transparency and by whom?
- What are the challenges involved in tax transparency reporting?
- Ensuring compliance to national and international tax transparency regulatory requirements
- The benefits of tax transparency reports for your particular organization
- Does tax transparency reporting have to be audited?
- Issues of aggressive tax avoidance

**Barbara Triberti**  
**Direct Tax Manager**  
**Vodafone, Italy**

**09:35 Value chain analysis in the current tax environment**

- What is it, and how can it be used in tax?
- How to align your operational, tax and legal structures to achieve sustainable financial and operational benefits during business transformation.
- Issues addressed through Value Chain Analysis:
  - How to assess your transfer pricing model's alignment with the OECD BEPS principles
  - Supporting your Master File and Country by Country Reporting
  - How to prepare for discussions with tax authorities and stakeholders

**Harm J. Oortwijn**  
**Director International Tax**  
**Paramount, Netherlands**

**10:10 New developments in Permanent Establishments (OECD report to be released in 2016)**

- What is new?
- Action 7-2015 Final Report-Lessons learned
- Follow up on issues related to attribution of profits to PEs
- Profit allocation
- Transfer pricing in the context of a PE

**Raffaele Petruzzi**  
**Managing Director**  
**WU Transfer Pricing Center, Austria**

**10:40 Business networking platform – Coffee break**

SHAKE HANDS, EXCHANGE BUSINESS CARDS AND BUILD UP NEW CONNECTIONS

**11:20 The developing role and responsibilities of tax executives**

- How do we increase senior management awareness?
- How a sound tax function can be an integral part of business processes, focusing on proactive tax risk management and tax efficiency
- How to optimize tax strategies and keep them aligned with business strategy
- Negotiating with tax authorities in a post BEPS world
- Tax team of the future

**Evelyn Arnold**  
**Head of Tax and Finance**  
**Zurich Insurance Group, Germany**

**12:00 Update on Transfer Pricing and Commodity Transactions**

- New developments surrounding the BEPS Final Report 2015 on Commodity Transactions
- Impact of the report and application in practice
- The definition of pricing policies for commodity transactions
- Experience with benchmarking and in tax audits

**Sophia Reismann**  
**Tax Expert – Global TP**  
**OMV, Austria**

**12:35 NETWORKING LUNCH.**

GREAT OPPORTUNITY TO INTERACT WITH MARKET LEADERS, EXCHANGE PERSPECTIVES AND BUILD UP CONTACTS

**13:40 Practical topics of implementation of master file and country specific file**

- How to organize the implementation
- Which data could be used
- Critical points

**Georg Berka**  
**Head of International Tax**  
**Raiffeisen Bank, Austria**

**14:10 The location of headquarters and international taxation- fiscal benefits and challenges**

- Increasing inspection of the tax authorities on cross border debt/equity instruments
- Reclassification of equity instruments to debt instruments from a tax perspective
- Substance over Form doctrine/approach is implemented
- Identifying fiscal jurisdictions most beneficial to your fiscal requirements
- Determining post migration/relocation challenges and issues

**Zahira Quattrocchi**  
**Group Tax Director**  
**Barilla, Italy**

**14:45 Business networking platform – Afternoon Coffee break****15:15 BEPS: What next and where will be by 2018**

- Impact of changes under the Treaty abuse paper:
  - what are you planning to do and how will it impact your business
- How effective will these OECD guidelines be in minimizing hybrid mismatch arrangements?
- The quest to reduce international tax jurisdiction competition
- How will these OECD BEPS recommendations will reduce corporate tax-planning strategies that exploit the gaps and loopholes of the current system

**Bartjan Zoetmulder**  
**Tax partner**  
**Loyens & Loeff**  
**Dutch Tax Bar Association, Netherlands**

**15:50 Transfer Pricing issues related to financial transactions**

- OECD guidance on the pricing of intercompany loans
- Pricing of guarantees
- How to determine the pricing of intercompany loans: an example

**Piero Bonarelli**  
**Head of International Tax Affairs**  
**UniCredit, Italy**

**16:30 Chairman's summary & closing remarks**

**08:30 Re-registration & morning coffee****08:50 Welcome & opening remarks from the Chairman****OPENING ADDRESS****09:00 Successfully meeting the requirements for increased tax transparency**

- Ensuring compliance to tax transparency regulatory requirements
- Approaches to tax disclosure in your statutory accounts
- What are the challenges involved in tax transparency reporting?
- Tax Frameworks, publishing of tax strategy documents; Public disclosure of data – what do you do and when

**Roderick Sayers**  
Group Head of Tax  
Petrofac Services Limited, UK

**09:35 Implications of BEPS on M&A projects**

- Post-BEPS due diligence
- Impact on acquisition structuring
- BEPS-aspects in the SPA

**Dr. Clemens Nowotny**  
Partner, Tax Advisor  
LeitnerLeitner, Austria

**10:10 A focus on the concept of establishment – Foreign subsidiary vs branch/PE:**

- Pros & cons from a legal, accounting and tax perspective – a pragmatic approach
- Sub vs branch - in the context of Austrian group taxation (court cases)
- Corporate reorganizations Sub >> Branch: cross-border tax effects
- (Deemed) PEs/Subs: impact on deferred income taxation?

**Dr. Adolf W Poindl**  
Group Head of Tax  
Megatech Industries AG, Austria

**10:45 Business networking platform – Coffee break****11:15 Understanding the complexities of tax rulings in relation to state aid and how this is being investigated and penalised**

- Tax rulings from a general perspective
- How State aid law is changing the tax environment
- Trying to get some certainty

**Federica Pitrone**  
International Taxation  
Banca Intesa SanPaolo, Italy

**11:50 BEPS compliance concerns**

- BEPS Compliance Risks
- Administrative Issues
- Internal Analysis for Audit Risk Management

**JD Choi**  
Chief Executive Officer  
Tax Technologies, Inc. USA

**12:25 Country by Country Reporting – where are we standing one year later**

- The latest update on countries' legal implementation
- Our own approach
- Tricks and tips

**Andrea Lee**  
Head of Desk Transfer Pricing  
Erste Group Bank AG, Austria

**13:00 STRATEGIC INTERACTIVE LUNCH.**

ROUND-TABLE SETTINGS, PARTICIPANTS WILL BE DISCUSSING PRE-SELECTED TOPICS IN SMALL GROUPS, WITH THE CONTRIBUTION OF A TABLE MODERATOR TO MAKE THE DISCUSSION MORE ENERGETIC.

**14:00 SUMMING UP STRATEGIC INTERACTIVE LUNCH DISCUSSION****14:10 Country by Country reporting- Italian implementation**

**Giuseppe Natali**  
Head of International Tax  
Autostrade per l'Italia, Italy

**14:45 Transfer Pricing strategies with a focus on Far East Region and BRIC countries**

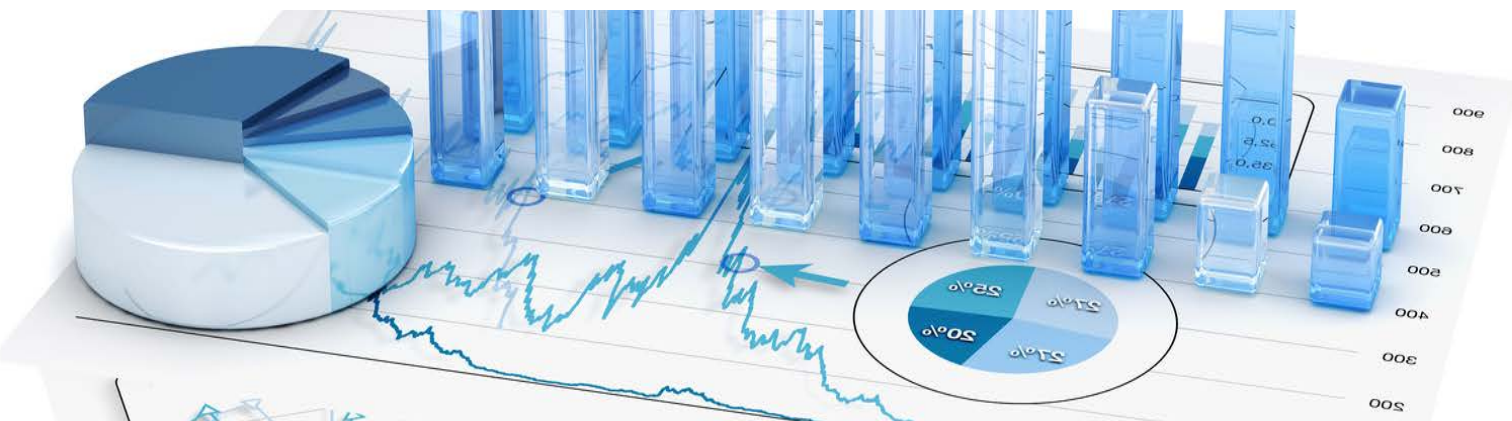
- How does Transfer Pricing in these jurisdictions differ from other countries
- Current experiences, challenges and opportunities
- What is taken up by foreign auditors? What is the escalation? What are the possibilities of understanding (MAP / APA)?
- Different countries Documentation Requirements Is a uniform documentation approach possible and make sense?

**Konstanze Weber**  
Head of Tax Planning and Tax Regions Far East/Europe  
Beiersdorf AG, Germany

**15:20 CLOSING ADDRESS****Transfer Pricing documentation in practice - Problems and experiences**

- Establishing documentation requirements, practical and regulatory
- Documentation of extraordinary transactions
- Problem areas in audits
- Recent experience with the audit

**Ivelina Georgieva**  
Transfer Pricing Manager  
Carlsberg, Germany

**15:55 Closing remarks & Chairman's summary****16:00 Post conference coffee break and end of conference**

Please fill in a separate Registration Form for each delegate using BLOCK CAPITALS and send it to us via e-mail or fax.

**DELEGATE DETAILS**

Full Name:

Job Title:

Company:

Direct Tel.:

Mobile:

Fax:

Email:

**COMPANY DETAILS**

Address:

City:

Post Code:

Country:

VAT Reg. Number:

**REGISTRATION**

Conference registration fee\* 1 600 EUR + 19% VAT = 1 904 EUR

Conference materials only 500 EUR + 19% VAT = 695 EUR

\* Fee includes conference materials, luncheons and refreshments during the 2-day event and all service charges.

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Once a conference space has been allocated to you, we will write to confirm the date and receipt of your payment.

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**WITH THANKS**

I WOULD LIKE TO THANK EVERYONE WHO ASSISTED WITH THE RESEARCH AND ORGANISATION OF THIS FORUM, PARTICULARLY THE SPEAKERS FOR THEIR SUPPORT AND COMMITMENT.

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**ACCOMMODATION**

HOTEL ACCOMMODATION AND TRAVEL EXPENSES ARE NOT INCLUDED IN THE REGISTRATION FEE.

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