
Registration & Coffee

08:30 - 09:00

Chair's Opening Remarks

09:00 - 09:10
Main Conference

Dispute Prevention & Resolution

09:10 - 09:40
Main Conference

Participants

Sandra Knaepen - Head of Mutual Agreement Procedure Unit, OECD

Effectively Managing Tax Risk and Controversy in a New Era of Transparency

09:40 - 10:20
Main Conference

- The increasing threat of reputational risk
- Managing relationships with the tax authorities
- The big push for transparency and exchange of information
 - Latest OECD discussions
- Effectively and efficiently presenting tax risks

Participants

Lee Holloway - Head of Tax, NEXT
Anna Mulcahy - EMEA Tax Senior Director, DELL
Walter Andreoni - Partner, MERCANTI DORIA & ASSOCIATI
Desmond Webb - Deputy Group Tax Director, VODAFONE

The Corporate Criminal Offence

10:20 - 10:50
Main Conference

- Overview and scope of the offence
- Practical steps on how to approach these rules
- Other HMRC initiatives

Participants

Jason Collins - Partner, PINSENT MASONS

Networking Coffee Break

10:50 - 11:10

Indirect Tax Disputes: Brexit and Beyond

11:10 - 11:50
Main Conference

- Update on recent cases
- Technical VAT issues
- The Brexit effect
- VAT beyond the UK

Participants

Leslie Allen - Partner, MISHCON de REYA
Dario Garcia - Consultant, MISHCON de REYA
Melanie Hall QC - Barrister, MONCKTON CHAMBERS
David Scorey QC - Barrister, ESSEX COURT CHAMBERS

Diverted Profits Tax after Glencore

11:50 - 12:20
Main Conference

- DPT: Weaponized transfer pricing
- The limits of judicial review before and after Glencore
- How to make the best of the statutory process
- The benefits of forensic IT

Participants

Robert Hartley - Partner, MISHCON de REYA

Networking Lunch

12:20 - 13:20

International Tax Litigation: The View from the Bench

13:20 - 14:00
Main Conference

This panel, featuring an esteemed panel of senior Tax Tribunal Judges, will explore how the judiciary perceives the battlefield between taxpayers and tax administrations in the context of complex international tax litigation, including the challenges of procedure, case management, fact-finding and evidence, and much more besides. Also, don't miss this opportunity to understand what is involved in litigating tax cases after BEPS.

Transfer Pricing Disputes in a Post BEPS Environment

14:00 - 14:40
Main Conference

- Overview of the current controversy landscape
- TP Audits in an ideal world
- Practical options and guidance on best practices for resolving disputes
- What's next for transfer pricing controversy
- The *Chevron* decision, and the wider implications for multinationals

Participants

David Kelly - International Tax Manager, DELL
Erik Knijnenburg - Global Head of Tax & TP, H&M
Glenn Price - Head of International Tax, VODAFONE
Catherine Clare - Group Tax Projects Manager, INFORMA
Shaun MacIsaac QC - Attorney, PITMAN MACISAAC & ROY

GAAR and EU Anti-Tax Avoidance Directives

14:40 - 15:20
Main Conference

- The UK GAAR: Where are we now?
 - The Rangers case
- The European Commission and the anti-avoidance landscape
 - Increasing transparency: CBCR public and private, exchange of tax rulings, new transparency rules for tax planning intermediaries.
 - Ensuring an effective taxation: ATAD 1, ATAD2, CCTB, Communication on Fair Taxation of the Digital Economy
 - Securing a level playing field: EU black list

Participants

Patricia Lampreave - EU Tax Professor & Former EU Tax Expert, EUROPEAN COMMISSION

Networking Coffee Break

15:20 - 15:40

EU State Aid: Minimizing Risk and Managing Controversy

15:40 - 16:10
Main Conference

- Risks associated with EU State Aid
- Current position of the European Commission & the transparency agenda
- Implications of Brexit
- What corporates should be doing now to minimize risk
- Pre-litigation strategies

Participants

Jan Weerth - Group Tax, DEUTSCHE BANK

Max Lienemeyer - Head, Task Force Tax Planning Practices (DG Competition), EUROPEAN COMMISSION

Permanent Establishments & Treaty Conflicts

16:10 - 16:50
Main Conference

Participants

Giles Parsons - Senior Tax Director, CATERPILLAR

Susana Bokobo - Tax E&P Global Policy Leader, Repsol; Vice Chair Commission on Taxation, ICC

Alternative Dispute Resolution Strategies & Recent Settlement Initiatives

16:50 - 17:30
Main Conference

- BEPS Action 14
 - The Multilateral Instrument: Uncertainties ahead?
 - The Permanent Court of Arbitration
 - MAP Processes
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Close of Conference & Drinks Reception

17:30 - 18:30

SCHEDULE

International Tax Dispute Resolution and Litigation Summit
2017

MAIN CONFERENCE - DRAFT AGENDA - 22/11/
2017

22 November 2017
Sofitel London St James
London

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