

12-13 OCTOBER 2017 Amsterdam, The Netherlands NH Carlton Amsterdam

# 4th ANNUAL CORPORATE TAX SUMMIT

# Managing the corporate tax function as a value driver to boost your competitive advantage

Speakers

Roderick Sayers Independent Tax Expert

Andrei Belinski Head of International Tax Centrica, UK

Mathilde Ostertag Local Partner GSK Luxembourg SA, Luxembourg

Anastasia Sagianni Partner, Transfer Pricing Eurofast

Tim Mathey Director European Tax Electronic Arts, Switzerland

Charalambos Antoniou Global Head of Tax Operations, Transformation and Risk Management Zurich Insurance Company, Switzerland Konstanze Weber Head of Tax Planning and Tax Regions, Far East/Europe Beiersdorf AG, Germany

Till Reinfeld Partner, Transfer Pricing WTS, Germany

Andreas Riedl Senior Manager, Transfer Pricing WTS, Germany

Guido van Aarle Managing Director Andersen Tax & Legal, The Netherlands and Managing Director Keeyns B.V., The Netherlands

Sophia Reismann Tax Expert - Global Transfer Pricing OMV, Austria

Harm J. Oortwijn Senior Manager Tax Whirlpool Corporation

Ilaria Palieri International Tax Senior Manager EY, Luxembourg Sam Cicogna VP & Head of ONESOURCE Transfer Pricing Thomson Reuters, UK

Dr. Clemens Nowotny Partner, Tax Advisor LeitnerLeitner, Austria

Dr. Jochen Bahns Partner Lawyer, Tax Consultant Flick Gocke Schaumburg Partnerschaft, Germany

Alice Soh Transfer Pricing Vice President Barclays, UK

Reinout de Boer Senior Counsel Tax Law Amsterdam Stibbe, The Netherlands

Willem Bongaerts Partner, Tax Bird & Bird, The Netherlands

Hema Khurana Director Transfer Pricing & International Tax Deloitte

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Thursday, 12<sup>th</sup> October 2017

# DAY 1

08:30	Registration & Morning Coffee
08:50	Welcome & Opening remarks from the Chairman Roderick Sayers Independent Tax Expert
KEYN	DTE ADDRESS
09:00 • • • •	Best-practice in Country by Country Reporting Enhancing clarity and transparency A focus on risk assessment tools within country-by-country reporting Data analytics tools and strategies CbC data: reconciling statutory and management view CbC data: looking at profitability and "fair share" on entity by entity basis CbC reporting: value in other areas of the organisation Managing reputational risk as a result of CbCR Andrei Belinski Head of International Tax Centrica, UK
09:35 • • •	Implementation of the Multilateral Convention on BEPS Advances in minimising double-tax on investment Threats to effective implementation of Multilateral Instrument (MLI) Practical impact of the MLI on the corporate tax function Implications of treaty disparities and absence of uniformity Who are the winners and losers? Rod Sayers Independent Tax Expert
10:10 • • •	Implementation of the ATAD 1 and 2: Practical overview and EU comparison Overview of the EU Council's final compromise on ATAD and its proposed 5 measures ATAD measures vs BEPS recommendations - What's the difference? Status of implementation and impact in domestic law: comparative survey on several EU countries Case studies - How does the ATAD affect financial transactions? Timeline and key dates Mathilde Ostertag Local Partner GSK Luxembourg SA, Luxembourg
10:30	Business networking platform – Coffee break Shake hands, exchange business cards and build up new connections
10:50 • •	Tax Audit Challenges in SEE Key Risk Areas Taxpayer Awareness Managing Risks - The way of transparency Impact of BEPS in SEE Region Anastasia Sagianni Partner, Transfer Pricing Eurofast
11:25	A focus on Permanent Establishment Managing and mitigating Permanent Establishment risk Indicators of PE risk Developing PE regulatory requirements Managing PE across multiple countries and regions A focus on the developing implications of e-commerce on PE Tim Mathey
	Director European Tax Electronic Arts, Switzerland
12:00 • •	Transformation of the global tax function The tax transformation journey Key drivers of tax transformation Review of tax operating models Key remarks from a tax transformation journey Charalambos Antoniou

Global Head of Tax Operations, Transformation and Risk Management Zurich Insurance Company, Switzerland

#### 12:35 Networking lunch

Great opportunity to interact with market leaders in a relaxing environment. Exchange perspectives on best practice and build up new contacts

13:35	5 Managing, preventing and resolving Transfer Pr Forecasting the future scale and scope of tax disputes Establishing a robust and flexible framework for dealing wird disputes Effectively responding to a transfer pricing enquiry Mutual Agreement Procedures and the EU Arbitration Conv Understanding the practical elements of arbitration proced Advance Pricing Agreements Konstanze Weber Head of Tax Planning and Tax Regions, APAC/Europe Beiersdorf AG, Germany	th Transfer Pricing ention
14:10	D       Efficient TP tax risk and process management Challenges and opportunities due to increased TP docume Managing and monitoring TP compliance risks Implementation of an effective internal control system Maximizing cost-efficiency Increasing automation and reliability of TP processes         Till Reinfeld Partner, Transfer Pricing WTS, Germany       Andreas Riedl Senior Manager, Transfer	J
14:40	D Business networking – Afternoon tea	
15:10 • •	<ul> <li>Keeyns / Software solution         Total Control Whenever Wherever         Global tax control and good tax governance is becoming in         Control your Tax advisory, Compliance and Corporate docur         Safeguarding data, information and knowledge within your         www.keeyns.com         Guido van Aarle         Managing Director         Andersen Tax &amp; Legal, The Netherlands         and         Managing Director         Keeyns B.V., The Netherlands     </li> </ul>	ments
•	Total Control Whenever Wherever Global tax control and good tax governance is becoming in Control your Tax advisory, Compliance and Corporate docur Safeguarding data, information and knowledge within your www.keeyns.com <b>Guido van Aarle</b> Managing Director <b>Andersen Tax &amp; Legal, The Netherlands</b> and Managing Director <b>Keeyns B.V., The Netherlands</b>	cing

16:30 Networking reception

# Sli.do Interactive Q&A platform



Kristina Polikhronidi, Project Manager tel. +420 724 344 280 email: kristina@uni-global.eu Jana Malysheva, Event Manager tel. +420 226 220 420 email: jana@uni-global.eu



#### 08:30 Re-registration & morning coffee

#### 08:50 Opening remarks from the Chairman Roderick Sayers

Independent Tax Expert

# **OPENING ADDRESS**

# 09:00 Operational excellence for corporate tax management

- Developing role and responsibilities of tax executive management
- Tax function as a corporate value-driver
- Supply chain planning
- Documentation management
- Process management
- Mitigating compliance risk
- Operational risk
- Standardisation and automation
- Talent management across all
- Making best use of technology
- What is the burden and cost of compliance?
- Harm J. Oortwijn Senior Manager Tax Whirlpool Corporation

#### 09:35 State aid, MNEs and Tax Rulings

- What is Fiscal State aid
- State aid and Tax Rulings
- Key developments in fiscal State aid over the last 12 months
- Impact for MNEs

### Ilaria Palieri

International Tax Senior Manager EY, Luxembourg

#### 10:05 Utilizing technology to gain efficiencies in the tax lifecycle

Today's landscape and risk profile for transfer pricing professionals is broader and more intense than ever before. The typical professional deals with risks related to audits, compliance, and exposure\reputation. The use of technology and sound processes can help transfer pricing professionals to turn this risk into competitive advantage. Join this session to learn how best in class professionals take charge of leading their function through the process using technology as an enabler

Sam Cicogna

#### VP & Head of ONESOURCE Transfer Pricing Thomson Reuters, UK

#### **10:35** Business networking platform – Coffee break Shake hands, exchange business cards and build up new connections

### 11:00 Place of management of holding companies – practical pitfalls and opportunities

- Issues under applicable tax treaties
- Dual residency of holding companies
- Risk of exit taxation
- Impact of modern information technologies
- Consequences of "de-facto" management structures

Dr. Clemens Nowotny	Dr. Jochen Bahns
Partner, Tax Advisor	Partner Lawyer, Tax Consultant
LeitnerLeitner, Austria	Flick Gocke Schaumburg Partnerschaft,
	Germany

### **11:30** Tax audit management

- What issues can trigger a transfer pricing audit by the tax authorities?
- The importance of maintaining close and transparent relationships with the auditors
- Ensuring efficient and well-structured documentation management
- Managing the complexities of cross-border audits
- Dispute management
- Impact of CbC reporting on potential for tax audits
   Alice Soh
   Transfer Pricing Vice President
  - Barclays, UK

Friday, 13th October 2017

DAY 2

12:05 • •	The Anti-Hybrid Mismatch Measures from the EU Anti-Tax Avoidance Directive Overview of the anti-hybrid mismatch measures as promulgated by the EU ATAD including with regard to hybrid financial instruments and (reverse) hybrid entities Practical examples of application of the rules for international business and investors Implementation challenges for taxpayers and tax authorities Interplay with other BEPS Actions Reinout de Boer Senior Counsel Tax Law Amsterdam Stibbe, The Netherlands
12:35	Strategic interactive lunch Round-table settings where participants will be discussing pre-selected topics in small groups, with the contribution of a table moderator to make the discussion more energetic.
13:50	<b>Conclusions from the interactive lunch discussions</b> Tables moderators will give a short overview of what was discussed during the interactive lunch
14:00	Taxation of IP in a Post BEPS world         Latest developments in taxation for i.a. Trademarks, Brand Names, IP patents, Life-sciences and other IP         Impact of OECD (BEPS) and EU (i.a. ATAD) on IP ownership structures         What happened to the IP boxes?         Modified Nexus Approach in a nutshell         How to set up R&D that can still qualify for tax purposes         The DEMPE principle         Dutch Cooperatives         Other recent developments         Willem Bongaerts         Partner, Tax         Bird & Bird, The Netherlands
14:30 • •	Operational Transfer Pricing – Putting Policies into Practice Overview of Changing Landscape Key elements of Operational Transfer Pricing Typical challenges multinational companies are facing Solution directions – process improvements & technology options Hema Khurana Director Transfer Pricing & International Tax Deloitte
15:00 • •	PANEL DISCUSSION         A focus on the take-homes and lessons learnt from dominant topics         and themes of the two days         Questions from the audience         Conclusion & summary of the event         Sophia Reismann         Tax Expert – Global Transfer Pricing         OMV, Austria         Charalambos Antoniou         Global Head of Tax Operations, Transformation         and Risk Management         Zurich Insurance Company, Switzerland         Till Reinfeld         Partner, Transfer Pricing         WTS, Germany         Andreas Riedl         Senior Manager, Transfer Pricing         WTS, Germany         Harm J. Oortwijn         Senior Manager Tax         Whirlpool Corporation         Andrei Belinski         Head of International Tax         Centrica, UK
15:30	Closing remarks & Chairman's summary





# Roderick Sayers Independent Tax Expert

Currently an Independent tax expert assisting companies in the extractives sector and mentoring senior tax leadership.

Extensive experience in the extractives industry and as a senior executive including being head of tax at

Premier Oil and head of tax at Petrofac Limited for seven years (FTSE Listed oil field services), General Manager Tax for EMEASA region with Rio Tinto and a Tax partner at EY.

#### **SPEAKERS**



Andrei Belinski Head of International Tax Centrica. UK

Andrei Belinski is Head of International Tax of Centrica plc, an energy and services company.

He has practiced international tax for over 20 years in several jurisdictions working for accountancy firms and large multinationals and specialises in tax issues arising from cross-border investments, treasury activities and transfer pricing.



#### **Mathilde Ostertag** Local Partner **GSK Luxembourg SA, Luxembourg**

Lawyer, admitted to the Bar in Luxemburg (2008); Avocat à la Cour; Local Partner GSK Luxembourg SA.

Licensed specialist for Tax Law spécialisées en Droit et fiscalité du commerce international)

Practice Areas: Tax, Corporate Tax, International tax Planning, Private Equity, Foreign Investments, Real Estate, Intellectual Property Transactions.

Education and Professional Experience: Université Robert Schuman, Strasbourg (France) and Freie Universität, Berlin; Master's degree and post graduate degree in corporate and tax law, tax specialisation (DJCE); Practiced within a Benelux and an international law firm in Luxembourg for the past nine years; Memberships: Young International Fiscal Association (Young IFA); International Fiscal Association (IFA)

Languages: German, English, French, Portuguese

Publications: Ostertag, Mathilde: Le ruling TVA: enjeux et perspective, Ed° Les Collégiales du droit, 2015



#### Anastasia Sagianni Partner, Transfer Pricing **Eurofast**

Anastasia is the Head of Transfer Pricing Division at Eurofast, responsible for clients in South East Europe and Middle East. Anastasia obtained her BSc in Economics from the National and Kapodistrian University of Athens with major in Economics and Business Finance, where she also pursued her MSc degree in Applied Economics and Finance, with academic direction in Applied Accounting and Audit.

In 2010, Anastasia obtained her professional qualification in Audit by the Institute of Certified Public Accountants of Greece (IESOEL) and since January 2014, she is regarded a Certified Public Accountant according to the Greek legislation. During her professional career, Anastasia was involved in financial audits and preparation of financial statements in accordance with International Financial Reporting Standards (IFRS).

Anastasia specialises in transfer pricing and has substantial experience in various industries. With her interdisciplinary know-how on tax, business and markets, she advises on designing the transfer pricing model that suits to each business. Anastasia was involved in the reviewing of educational material in economics for the Vocational Training Centre of the National and Kapodistrian University of Athens and is a distance learning lecturer in accounting programs at the Vocational Training Centre of the National and Kapodistrian University of Athens.



#### **Tim Mathev** Director European Tax **Electronic Arts, Switzerland**

To date Tim has accumulated 15 years of international tax experience working in practice and in-house in different countries including Germany, Luxembourg, the UK and Switzerland.

In his current position, Tim is the European Tax Director at Electronic Arts (EA) in Geneva, EA markets, publishes and distributes game software and content for a variety of gaming platforms. Tim's passion for tax, his keen interest in technology and appetite for a good challenge

from an ever changing environment means that he is currently in just the right place at EA. Striving to dedicate an ever increasing share of his time to tax risk management, Tim is a strong advocate for the identification and implementation process efficiencies

Prior to joining EA, Tim was a Senior Tax Manager at Omnicom, a leading global advertising and marketing communications company with a strong portfolio of branded networks. At Omnicom Tim mainly focused on the development and implementation of tax planning opportunities, tax audit defense as well as compliance with local transfer pricing regulations.

Tim studied Business Administration in Mannheim, Germany and is a certified German tax advisor. He is fluent in English, French and German and, depending on the form of the day, somewhat proficient in Spanish



#### **Charalambos Antoniou** Global Head of Tax Operations, Transformation and Risk Management **Zurich Insurance Company, Switzerland**

Harry is an ACCA, ADIT gualified tax professional with over thirteen years tax experience to the Banking and

Insurance sectors. Harry heads up Tax Operations, Transformation and Risk Management function in Zurich's

Group Tax department and works closely with Group Tax and other Group Finance departments to ensure the

Group's finance and tax strategies are achieved. Previously, he headed Zurich's Tax Accounting and Reporting function. He is also a freelancer part-time lecturer for ACCA and ADIT papers.



#### Konstanze Weber Head of Tax Planning and Tax Regions, Far East/ Europe

#### **Beiersdorf AG, Germany**

Konstanze joined the Beiersdorf Tax Department in 2001 and was in charge for international tax topics at group level since then. She defined and managed Beiersdorf Transfer Pricing policies and was responsible for tax matters of various restructuring projects. She is leading Beiersdorf's tax planning team which is taking care of all kinds of business restructurings and M&A activities within the group. In the regions APAC and Europe she is

advising the local Beiersdorf affiliates and defending the Beiersdorf tax policy in their local tax audits.

Prior to joining Beiersdorf Konstanze worked with tax advisory firms for international tax issues of both corporations and high net worth individuals. Konstanze is a certified German tax advisor



#### **Till Reinfeld** Partner, Transfer Pricing WTS, Germany

Mr. Reinfeld is part of WTS's Global Transfer Pricing and Valuation Practice, where he provides planning, documentation and litigation advice to international corporations. He heads the operational transfer pricing and transfer pricing process planning team of WTS. Furthermore, Mr. Reinfeld is an established expert regarding procedural tax law and overseas numerous litigations cases. On the topic of procedural tax law Mr. Reinfeld is a lecturer at the Bochum University of Applied

Sciences. Mr. Reinfeld is a lawyer and Certified Tax Advisor (Germany).







#### **Andreas Riedl** Senior Manager, Transfer Pricing WTS, Germany

Mr. Riedl is part of WTS's Global Transfer Pricing and Valuation Practice, where he provides planning, documentation and litigation advice to international corporations. He specializes in operational transfer pricing and transfer pricing process planning cases. In that regard, he focusses on the availability and analysis of internal data relevant for transfer pricing and the implementation of transfer pricing technology solutions. He frequently publishes articles on transfer pricing developments. Mr. Riedl holds an MSc-equivalent in

economics from the Universität Augsburg, Germany.



#### Sam Cicogna VP & Head of ONESOURCE Transfer Pricing **Thomson Reuters, UK**

Sam Cicogna brings a unique perspective to his job as Vice President and Head of ONESOURCE Transfer Pricing for the Corporate Division of Tax and Accounting. In this role he is responsible for the vision, direction and execution of all areas of the transfer pricing business.

His prior work experience in public accounting, corporate and tax software span a multitude of tax functions, helping him to develop a comprehensive and practical

Prior to joining the team, Sam touched the Thomson Reuters product suite in various ways: as a client, steering committee member, competitor, and public accounting firm user. These prior experiences allow Sam to directly understand market needs and the challenges of the end user interacting with our software and services on a daily basis.

Sam holds a Bachelor of Science in Business Administration (Accounting) from the university of Dayton and is a licenced Certified Publi8c Accountant in the State of Georgia. He is a member of the AICPA & the Association for Computers & Taxation, and is currently based in Atlanta, GA.



Guido van Aarle **Managing Director** Andersen Tax & Legal and Managing Director Keeyns B.V., The Netherlands

Tax assurance and being in control in all tax areas is becoming increasingly important for companies. I mainly focus on setting up and presenting tax control frameworks, TP implementation as well as advising multinationals on all possible fiscal cross-border issues. Within Andersen Tax & Legal, I worked for several years as an interim tax manager/ director at a number of (publicly

traded) multinationals. As a result, I gained a broad knowledge of the total package and know what the various stakeholders of a multinational consider relevant. As such, I also worked with cross-border labor and the implementation and roll-out of the Dutch employee benefit taxation (WKR).

Before I started at Taxperience (now Andersen Tax & Legal) in 2009 I worked for Deloitte and EY in the international (corporate) consulting practice.



Sophia Reismann Tax Expert – Global Transfer Pricing **OMV.** Austria

As part of OMV Group's tax function, Sophia's focus lies on the diverse aspects of the Group's transfer pricing agenda. At OMV, she covers areas such as the definition of pricing standards, intercompany commodity and financing transactions as well as transfer pricing compliance related issues.

Before joining OMV, Sophia worked at the transfer pricing department of PwC (Austria) for over 5 years providing a full range of services in the field of transfer pricing for

clients in various industries.

Sophia holds a Master in International Business from the Vienna University of Economics and Business Administration, where she specialised in international taxation





multinationals to financial institutions).

She has published numerous articles on EU tax matters.



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

Harm J. Oortwiin

Tax Management.

Ilaria Palieri

**EY, Luxembourg** 

Senior Manager Tax

Whirlpool Corporation

Harm recently (1 September 2017) changed position

from Director International Tax at Paramount Pictures (A

Viacom company) to Whirlpool as Senior Tax Manager

EMEA. He has some 20 years of international tax

experience with a number of multinational companies

as both in-house professional and tax consultant. He

graduated with honors from (UBI) United Business

Institutes in Brussels with a Masters degree in Global

llaria has a 10 years of experience as an international and EU tax advisor in Luxembourg. She is a member of

EY's EU Competence Group and a member of the EY

Ilaria has an extensive knowledge and advisory

experience in EU tax law and State aid. She has been assessing EU State aid risks in direct taxation and BEPS

exposure for various groups in diverse industries (from

International Tax Senior Manager

State Aid Technical Committee.

Clemens Nowotny specializes in taking care of domestic and foreign companies in all matters

concerning Austrian or international tax law. His specialties include in particular supporting foreign investors making inbound investments into CEE/SEE countries, group tax planning, issues associated with establishing PEs and PE profit allocation, as well as withholding tax and the taxation of international artists and athletes.

Furthermore, he counts as one of Austria's leading experts on transfer pricing and is listed as an acknowledged specialist in "World Transfer Pricing" and the "Expert Guide to the World's Leading Transfer Pricing Advisers". Clemens Nowotny regularly provides advice on the structuring and implementation of transfer pricing models, the defence of transfer pricing systems in tax auditing procedures, the collection of binding rules, the resolution of international transfer pricing disputes, and the preparation of transfer pricing documentation and benchmarking analyses.

He is in demand as a speaker, both in Austria and abroad, on issues related to his areas of expertise, and his opinions on topics connected with transfer pricing are regularly published ("Verrechnungspreisrichtlinien - Praxiskommentar" [Transfer Pricing Guidelines - Practical Commentary]).

Clemens Nowotny is a tax advisor and has been a partner at LeitnerLeitner since 2008.



#### **Dr. Jochen Bahns** Partner Lawyer, Tax Consultant Flick Gocke Schaumburg Partnerschaft, Germany

Jochen Bahns is a lawyer and tax consultant at the Bonn office of FGS. He advises multinational corporate groups on all areas of German and international tax law, in particular M&A, corporate reorganizations and the structuring of inbound and outbound investments. His practice also covers tax audits, litigation and transfer pricing proceedings.

Jochen Bahns is a frequent speaker and author on topics relating to international taxation at national and international seminars and a guest lecturer at the German Federal Finance Academy.





#### Alice Soh **Transfer Pricing Vice President** Barclays, UK

CA Singapore, CPA Australia, joined Barclays as VP in Transfer Pricing in December 2009.

Key lead for transfer pricing in EMEA and also covering AP transfer pricing matters, responsible for setting global transfer pricing policy and strategy for businesses/products, including business support, compliance, documentation, audit and implementation.

More recently, has been the key transfer pricing lead in the Barclay's structural reform project and cost transformation projects. Prior to Barclays, worked in KPMG Singapore and KPMG New York transfer pricing team.



#### **Reinout de Boer** Senior Counsel Tax Law Amsterdam **Stibbe, The Netherlands**

Reinout specialises in domestic and international taxation with particular emphasis on mergers and acquisitions, private equity transactions and corporate reorganisations.

He has experience with tax controversy work, including litigation and second opinions, and leads Stibbe's tax controversy practice.

Reinout is a member of the advisory committee for taxation of the Dutch Bar Association. He also publishes and lectures regularly on international and EU tax law.

Prior to joining Stibbe, Reinout worked for over six years as tax policy advisor at the Dutch Ministry of Finance and as tax attaché at the Dutch Permanent Representation to the European Union in Brussels



#### Hema Khurana **Director Transfer Pricing & International Tax** Deloitte

Hema has worked in transfer pricing for over 15 years, is leading the Dutch Operational Transfer Pricing (Process and Technology offering) also working on global documentation & business restructuring for major multinationals operations in Europe and Asia.

She has extensive experience in designing and implementation of various operating models for clients across industries and working closely with supply chain and technology experts.



#### Willem Bongaerts Partner, Tax **Bird & Bird, The Netherlands**

Renowned for his cross-border work, Willem is seen as a leading tax lawyer.

Willem heads our Dutch Tax Practice. He is a partner based in The Hague and is admitted to the bar in the Netherlands and in Luxembourg.

A qualified tax lawyer, with more than 17 years of experience, Willem has built his practice around both international and domestic clients, with a particular

focus on innovative companies. He specialises in international tax and advises, amongst others, European and American multinationals on cross-border transactions, corporate reorganisations, and mergers and acquisitions. He also advises clients on creating European investment and private equity funds, real estate investment funds, financing, licensing and holding structures. He is also a member of our Life Sciences Group.

Willem worked as an international tax lawyer in the Netherlands, Luxembourg and New York.

Willem is a frequent speaker on tax related topics at internal and external seminars and conferences. In addition, he frequently acts as the chairman of a variety of conferences and seminars. Willem joined us in 2014. He holds Masters degrees in Notarial Civil Law from Leiden University and in Tax Law from the University of Amsterdam. Willem is a member of the Dutch Association of Tax Advisers (NOB), the International Fiscal Association, the Dutch Bar Association (NOvA), the American Bar Association and the New York State Bar Association.







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We have brought together dynamic, multi-cultural teams of lawyers with a strong capability to analyse complex legal scenarios from different perspectives to find the best solutions to serve the interests of our clients. Our lawyers are registered with the Luxembourg bar and other European or US bars and are active members of working groups organised by bodies of the financial industry in Luxembourg.

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# **Lunch Topics**

In order to bring added value to the conference we plan to arrange roundtable interactive session during the lunch on Day 1. We will invite all the participants to be actively involved in this session to share international and local experience, and in return take away new ideas and inspirations from industry peers across the globe.

#### What can you expect?

Round-table settings with different strategic topic of discussion on each table. Conference participants will select a table based on the topic they would like to discuss, and the questions they would like answered.

# Table 1

Is tax planning dead?

Roderick Sayers Independent Tax Expert

# 2 Table 2

The increasing role of technology in managing the corporate tax function

Bart-Jan Veenhof Director, Tax Longview Europe GmbH

### 3 Table 3

Opportunities in doing business in Balkans Panos Diallinas Regional Director EUROFAST GLOBAL EOOD

4 Table 4

# The use of TP tax technology

Till Reinfeld Partner, Transfer Pricing WTS, Germany Andreas Riedl Senior Manager, Transfer Pricing WTS, Germany

# 5 Table 5

#### **Intercompany Financing**

Sophia Reismann Tax Expert – Global Transfer Pricing OMV, Austria

# 6 Table 6

# **Tax challenges in M&A transactions**

Charalambos Antoniou Global Head of Tax Operations, Transformation and Risk Management Zurich Insurance Company, Switzerland

# 7 Table 7

Evolving technologies (e.g. Blockchain, Bots) and their effect on the TP function

Sam Cicogna VP & Head of ONESOURCE Transfer Pricing Thomson Reuters, UK

# 8 Table 8

MAP/APA experiences

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

# Table 9

Defending charges for centralized support/HQ functions and services – group view, entity/transfer pricing view and practical experiences

Andrei Belinski Head of International Tax Centrica, UK

# **10 Table 10**

Does the new tax environment affect investment strategies?

Mathilde Ostertag Local Partner GSK Luxembourg SA, Luxembourg

# **1** Table 11

The Brexit and its tax consequences; (how) should we anticipate?

Willem Bongaerts Partner, Tax Bird & Bird, The Netherlands





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