## Agenda–Day One, June 6, 2016

<table>
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<tr>
<th>Time</th>
<th>Session</th>
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<tr>
<td>1:00 – 1:30</td>
<td><strong>REGISTRATION</strong></td>
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<td>1:30 – 2:00</td>
<td><strong>I. Welcome</strong></td>
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<tr>
<td></td>
<td>• Peter Robinson, President &amp; CEO, USCIB</td>
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<td>• Pascal Saint-Amans, Director of OECD Centre for Tax Policy and Administration</td>
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<td>2:00 – 3:15</td>
<td><strong>II. Tax, Trade and Investment</strong></td>
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<td>Removing tax barriers to cross-border trade and investment is at the core of the OECD’s tax work. Tax policies can make growth more sustainable and inclusive by strengthening and expanding opportunities to participate in the economy and by sharing the tax burden in a fair manner. The effects of collective actions on BEPS and automatic exchange of information addressing both tax avoidance and evasion will shape future tax policy for inclusive growth. Tax uncertainty is often cited as a significant impediment to domestic investment as well as cross-border trade and investment. Tax uncertainty in some cases can have larger economic effects on business decisions than the amount of direct tax liability. National tax systems in a global economy require internationally coordinated rules to avoid double taxation, double non-taxation, and harmful tax practices. This panel will discuss both how tax policy and tax administration domestically and internationally can reduce tax uncertainty.</td>
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<td>• Pascal Saint-Amans, Director of OECD Centre for Tax Policy and Administration</td>
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<td>• Robert B. Stack, Deputy Assistant Secretary for International Tax Affairs, U.S. Treasury</td>
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<td>• Will Morris, Chairman, BIAC Committee on Taxation and Fiscal Affairs; Director, Global Tax Policy, GE International Inc. (United Kingdom)</td>
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<td>• Marty Sullivan, Chief Economist and Contributing Editor, Tax Analysts</td>
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<td>• Pam Olson, U.S. Deputy Tax Leader &amp; Washington National Tax Services Leader, PricewaterhouseCoopers LLP</td>
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<td>3:15 – 3:35</td>
<td><strong>REFRESHMENT BREAK</strong></td>
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III. The BEPS Project: Implementation Challenges and Opportunities

3:35 – 4:35

G20 Leaders in Antalya called on the OECD to develop an inclusive framework for the implementation phase of the BEPS project so that all interested countries and jurisdictions that have committed to the BEPS package can participate in the work on an equal footing with OECD and G20 countries. The inclusive framework will provide an opportunity for developing countries to take an even more active role in the BEPS work. At the same time, they face different challenges from more developed countries. This panel will discuss the inclusive framework as well as efforts being made to support developing countries such as the OECD/UN Tax Inspectors Without Borders initiative and the work on toolkits on transfer pricing comparability, indirect transfer of assets, transfer pricing documentation, tax treaty negotiations, base eroding payments, and BEPS risk assessment.

- Grace Perez-Navarro, Deputy Director, OECD Centre for Tax Policy and Administration
- James Karanja, Head of joint OECD/UNDP Tax Inspectors Without Borders (TIWB) Initiative
- Robert B. Stack, Deputy Assistant Secretary for International Tax Affairs, U.S. Treasury
- Logan Wort, Executive Secretary, African Tax Administration Forum (ATAF)
- Janine Juggins, Executive Vice President of Global Tax, Unilever

IV. Dispute Resolution: Making MAP Work

4:35 – 6:00

Action 14 of the BEPS Action Plan recognized that making dispute resolution more effective is crucial for the successful implementation of recommendations of the BEPS project. Effective treaty dispute resolution is one of the four “minimum” standards resulting from the BEPS project. This session will examine the progress made in establishing a robust peer review mechanism in the Forum on Tax Administration MAP Forum as well as progress on mandatory binding arbitration.

- Achim Pross, Head, International Cooperation and Tax Administration Division, OECD Centre for Tax Policy and Administration
- Doug O’Donnell, LB&I Commissioner, IRS
- Martin Kreienbaum, Director General, International Taxation, Federal Ministry of Finance, Germany
- Tim McDonald, Vice President - Finance & Accounting, Global Taxes, Procter & Gamble
- Craig Sharon, Principal, EY

6:00 – 7:30

RECEPTION – Sponsored by PwC
Agenda–Day Two, June 7, 2016

V. Permanent Establishments: They’re back...

8:30 – 10:00 In 2012, the OECD released for comments a revised version of proposed changes to the Commentary on Article 5 (the definition of permanent establishment) of the OECD Model Tax Convention. These proposed changes dealt with a number of controversial interpretative issues related to that definition.

These changes were put aside, but not forgotten, during the work on Action 7 of the BEPS Action Plan. The OECD is currently working on the integration of the 2012 proposed changes with the changes made to Article 5 by the Report on Action 7, with a view to producing the new version of Article 5 and its Commentary that will be included in the next update of the Model Tax Convention.

The panel will review the main issues that are being dealt with as part of that consolidation work.

• Jacques Sasseville, Head, Tax Treaty Unit, OECD Centre for Tax Policy and Administration
• Quyen Huynh, Associate International Tax Counsel, U.S. Treasury
• Porus Kaka, President, International Fiscal Association (IFA)
• Manal Corwin, National Leader, International Tax, KPMG

10:00 – 10:20 REFRESHMENT BREAK – Sponsored by CRA

VI. Transfer Pricing: Risky Business (Part I)

10:20 – 12:00 This first session on Transfer Pricing will examine the operation of the risk framework in the revised Chapter I of the OECD Transfer Pricing Guidelines, and will consider its implications for the current work on guidance on the attribution of profits to PEs. The session will also consider how the framework on risk and synergies can inform the work on the transfer pricing aspects of financial transactions.

• Andrew Hickman, Head of Transfer Pricing Unit, OECD Centre for Tax Policy and Administration
• Mike McDonald, Financial Economist, U.S. Treasury
• Karine Uzan-Mercie, Vice President, Tax & Corporate Initiatives, Coca-Cola Enterprises
• Paul Morton, Head of Group Tax, RELX Group
Agenda–Day Two, June 7, 2016

12:00 – 1:30  **LUNCHEON AND KEYNOTE ADDRESS**  
John Koskinen, Commissioner of the Internal Revenue Service

Sponsored by EY

VII. Interest Deductibility

1:30 – 2:30  Because the use of related party interest deductions is one of the easiest ways to accomplish BEPS, the Report on Action 4 of the BEPS Action Plan establishes a common approach for countries to take in preventing base erosion through the use of interest expense and other financial payments that are economically equivalent to interest. This panel will discuss the various elements of the common approach and its application.

• Achim Pross, Head, International Cooperation and Tax Administration Division, OECD Centre for Tax Policy and Administration
• Mike Williams, Director, Business and International Tax, HM Treasury
• Jason Yen, Attorney Advisor, U.S. Treasury
• Saul Rosen, Senior Tax Counsel, Citigroup

VIII. The Multilateral Instrument: Moving from Policy to Reality

2:30 – 3:30  The work on BEPS resulted in a number of agreed changes to the OECD Model Tax Convention. Given that there are more than 3,000 bilateral treaties in existence, however, implementing these changes through bilateral negotiation could take years, if not decades. Action 15 of the BEPS Action Plan called for the development of a multilateral instrument to enable countries to swiftly amend their tax treaties to implement the treaty-related BEPS recommendations. An Ad Hoc Group consisting of 95 countries and a number of non-State jurisdictions and international organisations was created for this purpose, and the development of the multilateral instrument began in 2015, with the goal of reaching agreement by the end of 2016.

This panel will examine the main issues being addressed by the Ad Hoc Group, including 1) the challenge of arriving at a single instrument to modify a widely varied network of existing treaties; 2) how to incorporate flexibility while maintaining clarity and coherence; and 3) how to develop an effective provision on arbitration.

• Jesse Eggert, Senior Advisor—BEPS, OECD Centre for Tax Policy and Administration
• Mike Williams, Director, Business and International Tax, HM Treasury
• Henry Louie, Deputy to the International Tax Counsel (Treaty Affairs), U.S. Treasury
• Mary Bennett, Partner, Baker & McKenzie
Agenda–Day Two, June 7, 2016

3:30 – 3:50   REFRESHMENT BREAK – Sponsored by

IX. Transfer Pricing: Risky Business (Part 2)

3:50 – 4:50   This second transfer pricing session will examine the implications of the risk framework for revised guidance on profit splits. The session will also consider implementation of the approach to Hard-to-Value Intangibles, and the implications of the revised guidance on cost contributions arrangements.

• Andrew Hickman, Head of Transfer Pricing Unit, OECD Centre for Tax Policy and Administration
• Brian Jenn, Attorney Advisor, U.S. Treasury
• Bill Sample, Vice President – Tax, Microsoft
• Philippe Penelle, Principal, Deloitte

X. Closing Remarks

4:50 – 5:00   • Pascal Saint-Amans, Director of OECD Centre for Tax Policy and Administration
• Carol Doran Klein, Vice President and International Tax Counsel, USCIB