



OECD International Tax Conference

June 4-5, 2018 • Washington, DC

The Four Seasons Hotel
2800 Pennsylvania Ave., NW

Conference Day One – June 4

1:00 – 1:30 **REGISTRATION**

I. Welcome

- 1:30 – 2:00
- Peter Robinson, President and CEO, USCIB
 - Martin Kreienbaum, Chair, OECD Committee on Fiscal Affairs; Director General, International Taxation, Federal Ministry of Finance, Germany
 - Pascal Saint-Amans, Director, OECD Centre for Tax Policy and Administration
- [Speaker Bios](#)

II. International Tax Aspects of the U.S. Tax Reform

- 2:00 – 3:15
- Five months on from the signing into law of the most fundamental tax reform in the U.S. in over 30 years, this panel will discuss the overall assessment of the reform, its likely impact on investment decisions, the current state of play of additional needed guidance and what's next.*
- Grace Perez-Navarro, Deputy Director, OECD Centre for Tax Policy and Administration
 - Lafayette (Chip) G. Harter, Deputy Assistant Secretary (International Tax Affairs), U.S. Treasury
 - Michael Graetz, Professor of Tax Law, Columbia Law School
 - Pam Olson, U.S. Deputy Tax Leader and Washington National Tax Services, Leader, PwC
 - Louise Weingrod, Vice President, Global Taxation, Johnson & Johnson
- [Speaker Bios](#)

3:15 – 3:35 **REFRESHMENT BREAK** – Sponsored by: **MAYER • BROWN**

III. Dispute Resolution, ICAP, MAP

- 3:35 – 5:00
- Concerns about tax uncertainty have increased as the world's economy and business models have been changing with global value chains, increased business activity across countries, greater digitalisation, more value held in intangible assets, and changes in domestic and international tax rules to reduce double non-taxation as well as to avoid double taxation. Increased tax certainty can support economic growth as well as cross-border trade and investment. The OECD and the G20 have made tax certainty a priority. This panel will explore sources of tax uncertainty in the large business segment and then discuss a range of mutually reinforcing dispute prevention and*

dispute resolution measures OECD is currently pursuing to strengthen certainty for business at key stages in the tax assessment cycle. These range from improvements in tax risk assessment, more effective use of CbC reporting information and the current pilot for the international compliance assurance program (ICAP), to the development of global awareness training for tax examiners and work on co-ordinated audit activity, as well as the latest on improvements to the effectiveness of the mutual agreement procedure (MAP), BEPS Action 14 and arbitration.

- Achim Pross, Head, International Cooperation and Tax Administration Division, OECD Centre for Tax Policy and Administration
- Fabrizia Lapecorrella, Director General of Finance, Ministry of Economy and Finance, Italy
- Doug O'Donnell, Commissioner, Large Business and International (LB&I) Division, IRS
- Dianne Mehany, Member, Caplin & Drysdale, Chartered
- Catherine Harlow, Head of Transfer Pricing, AstraZeneca
[Speaker Bios](#)

IV. Transfer Pricing – Part I

5:00 – 6:00

This first session on transfer pricing will cover current OECD work on guidance regarding the use of the transactional profit split method, as well as implementation guidance on the hard-to-value intangibles approach. The BEPS Actions 8-10 Final Report mandated follow-up guidance on profit splits to help determine when a profit split is the most appropriate method and to clarify how the method should be applied. The Final Report also included a new section on hard-to-value intangibles in Chapter VI of the Transfer Pricing Guidelines, and called for follow-up guidance on implementation of the guidance by tax administrations. This session will also consider the transfer pricing aspects of financial transactions. Financial transactions within multinational groups have not previously been covered in the Transfer Pricing Guidelines, and filling this gap is one of the follow-ups to the BEPS project. The panel will discuss these three areas and provide insights on upcoming developments.

- Tomas Balco, Head of the Transfer Pricing Unit, OECD Centre for Tax Policy and Administration
- Kevin Nichols, Senior Counsel, U.S. Treasury
- Elena Khripounova, Director of Transfer Pricing and Valuation Services, Mayer Brown LLP
- Patrick Brown, Vice President & Counsel, Tax, GE Power and Renewables
- Barbara Gallagher, Vice President Global Tax, Transfer Pricing, Pfizer Inc.
[Speaker Bios](#)

6:00 – 7:30

RECEPTION – Sponsored by:



Conference Day Two – June 5

8:00 – 8:30

CONTINENTAL BREAKFAST – Sponsored by:



V. Digital – Interim Report

8:30 – 10:00

Responding to a mandate from the G20, in March 2018 the OECD published the Interim Report on the Tax Challenges Arising from Digitalisation. Reflecting the latest discussions on this important topic from the +110 members of the Inclusive Framework on BEPS, the report includes an in-depth exploration of value creation in highly digitalised business models and its implications for the international tax rules, as well as identifying how different countries currently define the issues. In doing so, the report has laid the ground to work towards a consensus-based solution by 2020.

With some countries already implementing short-term measures, and the EU debates underway, the panel provides a timely opportunity to discuss the issues set out in the report, and to consider how the existing rules on nexus and profit allocation meet the demands of a digitalising economy, as well as the feasibility of some of the different options currently being debated.

- Pascal Saint-Amans, Director, OECD Centre for Tax Policy and Administration
- Gaël Perraud, Co-Chair, OECD Task Force on the Digital Economy; Director of International Taxation and European Affairs, Ministry of Economy and Finance, France
- Brian Jenn, Co-Chair, OECD Task Force on the Digital Economy; Deputy International Tax Counsel, U.S. Treasury
- Liz Chien, Vice President of Global Tax, Ripple Labs
- Bill Sample, Vice Chair, Taxation and Fiscal Policy Committee, BIAC; Tax Policy Advisor, Microsoft Corporation

[Speaker Bios](#)

10:00 – 10:20

REFRESHMENT BREAK – Sponsored by: Miller & Chevalier

VI. MLI and the Model

10:20 – 12:00

The release of the 2017 OECD Model Tax Convention and the entry into force of the Multilateral Instrument (MLI) on July 1, 2018 mark significant steps in international efforts to update the existing network of bilateral tax treaties to implement the treaty-related BEPS measures. These include minimum standards on the prevention of treaty abuse and on the improvement of dispute resolution. The MLI also includes the option to introduce a provision on mandatory binding arbitration, which supports wider efforts to improve tax certainty. Seventy-eight jurisdictions are now covered by the MLI, and more countries are planning to sign it soon. For most signatories, the MLI's provisions will start having effect in 2019/2020. This panel will look at the MLI's main provisions and the way they will modify over 1,200 tax treaties. The Panel will also discuss the challenges of implementing and applying the MLI.

- Sophie Chatel, Head of the Tax Treaty Unit, OECD Centre for Tax Policy and Administration
- Mike Williams, Director, Business and International Tax, HM Treasury
- Brian Ernewein, General Director (Legislation), Tax Policy Branch, Department of Finance, Canada
- Mary Bennett, Partner, Baker McKenzie
- Jesse Eggert, Principal, Washington National Tax, KPMG LLP
[Speaker Bios](#)

12:00 – 1:30

LUNCHEON AND KEYNOTE ADDRESS – Sponsored by:



Kevin Hassett, Chairman, Council of Economic Advisers

Interviewed by: Cathy Koch, Americas Tax Policy Leader, EY

[Speaker Bios](#)

VII. Corporate Tax Landscape

1:30 – 2:30

The centerpiece of the U.S. tax reform is a drastic cut to the corporate tax rate, from 35% to 21%, intended to make the U.S. a more attractive place to invest for both domestic and foreign companies. How does the U.S. tax reform alter the corporate tax landscape and what are the likely reactions of other countries? Are we headed to a race to the bottom or is this just a long overdue alignment with the trend in corporate taxation? This panel will discuss the U.S. tax reform in the global context.

- Pascal Saint-Amans, Director, OECD Centre for Tax Policy and Administration
- Martin Kreienbaum, Chair, OECD Committee on Fiscal Affairs; Director General, International Taxation, Federal Ministry of Finance, Germany
- Masanori Yoshida, Deputy Vice-Minister for International Tax Policy, Ministry of Finance, Japan
- Will Morris, Chairman, BIAC Committee on Taxation and Fiscal Affairs; Deputy Global Tax Policy Leader, PwC
- Amy Roberti, Vice Chair, Taxation and Fiscal Policy Committee, BIAC; Director, Global Tax & Fiscal Policy, The Procter & Gamble Company
[Speaker Bios](#)

VIII. Tax & Development

2:30 – 3:30

The role of tax in fostering sustainable development remains high on the political agenda, in particular due to the need for all countries to try to achieve the UN Sustainable Development Goals. Developing countries face different challenges from more developed countries in tackling BEPS and addressing international tax issues more generally. This panel will discuss recent efforts by the business community such as the B Team Responsible Tax Principles. It will also discuss the Inclusive Framework on BEPS, which now has over 110 members, as well as other efforts to support developing countries to improve the effectiveness of their tax systems such as the Platform for Collaboration on Tax, the OECD/UN Tax Inspectors Without

Borders initiative, and the efforts underway in regional tax organizations such as the African Tax Administration Forum.

- Grace Perez-Navarro, Deputy Director, OECD Centre for Tax Policy and Administration
- Alan McLean, Deputy Chair, Taxation and Fiscal Policy Committee, BIAC; Executive Vice President, Taxation and Corporate Structure, Royal Dutch Shell plc
- Mary Baine, Head, International Taxation & Technical Assistance, African Tax Administration Forum (ATAF)
- Janet Boyd, Director of Government Relations and Legislative Counsel, The Dow Chemical Company

[Speaker Bios](#)

3:30 – 3:50

REFRESHMENT BREAK – Sponsored by:



IX. Transfer Pricing – Part II

3:50 – 4:50

This session will consider the published guidance regarding the attribution of profits to permanent establishments. Guidance on the attribution of profits to permanent establishments created by the changes to the PE definition in Article 5 of the Model Tax Convention was mandated in the BEPS Action 7 Final Report. The panel will discuss this new guidance; provide an opportunity to discuss recent developments in transfer pricing; and also provide update on the upcoming work in the area of transfer pricing – namely the scoping work on Chapters IV (Administrative Approaches) and VII (Intra-Group Services) of Transfer Pricing Guidelines.

- Tomas Balco, Head of the Transfer Pricing Unit, OECD Centre for Tax Policy and Administration
- John Hughes, Director, APMA, IRS
- Mike McDonald, Executive Director, EY
- Jesper Barenfeld, Senior Vice President and Global Head of Tax, The Volvo Group

[Speaker Bios](#)

X. Closing Remarks

- Pascal Saint-Amans, Director, OECD Centre for Tax Policy
- Carol Doran Klein, Vice President and International Tax Counsel, USCIB

[Speaker Bios](#)

