

11th Corporate Tax Strategies & Experiences

Practical In-House Tax Executive Perspectives

November 16-17, 2023 Amsterdam



Giacomo Tassan-Din, Senior Director Transfer Pricing, GfK, An NIQ Company
"Transfer Pricing Controversy and Audit Risks"



Catherine Harlow, Head of Transfer Pricing, AstraZeneca
"The Latest Challenges of the Digital Economy, Including Pillar 1"



Carolina Graterol, Head of Company Tax and Transfer Pricing, Rosen Group
"How We Manage the Country-by-Country Reporting (CbCR)"



Christian Runge, Global Head of Transfer Pricing & Tax Technology, Shell
"ESG in Corporate Tax and Transfer Pricing"



Aaron Meneghin, Head of Group Tax, Valentino
"Case Study of the Implementation of the Italian Cooperative Compliance Program"



Sami Koskinen, Director, Stakeholder Relations, Finnish Tax Administration
"Finnish Tax Administration: Customer Orientation as a Strategic Priority Option"



Guney Bagislayici, Expert APA Team, Dutch Tax Authorities
"APAs and Advanced Rulings"



Fritz van Riel, Tax Director Direct & Indirect Tax, Genesys
"Tax Issues for Digital-First Companies"



Karl Berlin, Vice President, Head of Tax, Ørsted A/S
"Operational Excellence of a Tax Function"



Alfredo Manero Ruiz, Directorate of Fiscal Affairs, Repsol
"ESG in Corporate Tax and Transfer Pricing"



Christoph Huber, Head of Group Tax & Treasury, Oerlikon
"Our Tax Governance Framework"



Renata Ardous, Head of Global Transfer Pricing, Chanel
"The Best Approach to Value Chain Analysis (VCA)"



Robert Schulte, Founder & GM, LumaTax, a Taxually company
"The Role of Machine Learning and AI for Tax Leaders"



Robert Csabai, Head of International Taxation and TP, Hungarian Ministry of Finance
"Pillar 1 and Pillar 2 Developments and Implementation in Hungary"



Karine Halimi-Guez, Vice President, Head of Tax, Booking.com
"Tax Issues for Digital-First Companies"



Sandra Esteves, Head of Tax, Qlik
"Intangibles: Identifying the Value Added, the Functions Involved & the Subsequent Avenues for Defensible Tax Management"



Arsalan Mahmood Hasaan, Head of Taxes, Saudi Arabia, Siemens
"Digitalisation of Taxation"



Lisa Ramharter, Senior Tax Expert, OMV
"Latest In-House Developments on Pillar 2"



Lucas de Heer, Tax Manager EMEA, Netflix
"Permanent Establishments & Profit Attribution"



Johann Muller, Senior Transfer Pricing Expert
"Practical Transfer Pricing - No TPG"



Marco Orlandi, Transfer Pricing Lead, Shell
"ESG in Corporate Tax and Transfer Pricing"



Ali Özenli, Indirect Tax Manager, PepsiCo
"E-Commerce Issues within Corporate Tax"



Rasa Noak, Head International Tax, Oerlikon
"Our Tax Governance Framework"

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Day 1, November 16, 2023

08.30 – Registration and Coffee

09.00 – Opening Remarks from the Chair
Johann Muller, Senior Transfer Pricing Expert

09.20 – The Role of Machine Learning and AI for Tax Leaders

Tax Leaders must consider modern technology tools that leverage level-3 data to transform their departments into proactive corporate leadership

Robert Schulte, Founder & GM, **LumaTax, A Taxually Company**

10.00 – Intangibles: Identifying the Value Added, the Functions Involved & the Subsequent Avenues for Defensible Tax Management

Sandra Esteves, Head of Tax, **Qlik**

10.40 – How We Manage the Country-by-Country Reporting (CbCR)

- Our centralized data collection process
- Automating an end to end CbCR process
- Gaining strategic insights from the data to use in your tax planning

Carolina Graterol, Head of Company Tax and Transfer Pricing, **Rosen Group**

11.20 – Morning Coffee and Networking

11.50 – Breaking Up With Old Tax Habits: A Love Story with Technology

- Part 1: Old Habits
- Part 2: Breaking Up, And Why Now
- Part 3: When Technology Enters – The Path Towards New Habits
- Part 4: The Future Depends On What You Do Today

Stevi Froninckx, Co-founder and CEO, **Loctax**

12.30 – Our Tax Governance Framework

- Aligning Tax Risk Management with the Group's Tax Policy
- Developing a Global Tax Risk Management Policy
- Identifying high risk transactions and risk owners
- Defining a Tax Risk template input by local business units frequently
- Having a tax Risk process for communicating to and with all levels
- Preparing Tax Risk Scenario planning
- Scheduling frequent interviews with internal colleagues to identify and refresh risks

Christoph Huber, Head of Group Tax & Treasury, **Oerlikon**
Rasa Noak, Head of International Tax, **Oerlikon**

13.10 – Lunch Break

14.10 – Pillar 2 Developments and Implementation in Hungary

Robert Csabai, Head of International Taxation and Transfer Pricing, **Hungarian Ministry of Finance**

14.50 – The Latest Challenges of the Digital Economy, Including Pillar 1

- Recent developments on Pillar 1
- What are the tax challenges of digital business models and value chains
- Transfer pricing in a digital and post-BEPS world
- Practical aspects, how the tax function can control tax risks in the current digital environment

Catherine Harlow, Head of Transfer Pricing, **AstraZeneca**

15.30 – Latest In-House Developments on Pillar 2

- Updates on the new global minimum tax rules
- Status of the tax authority position on the rules
- Tax Implications for multinational corporations (from a tax and transfer pricing perspective)
- Considerations for international business
- How to manage the high compliance cost

Lisa Ramharter, Senior Tax Expert, **OMV**

16.10 – Afternoon Coffee and Networking

16.40 – Practical Transfer Pricing – No TPG

- Contract management and transactional tracking
- Identifying functions and spotting changes
- Optimised data collection and stakeholder management

Johann Muller, Senior Transfer Pricing Expert

17.20 – Operational Excellence of a Tax Function:

- Tax Function plan; Knowing your objectives and the processes and assets you need to accomplish those
- Tax Strategy; More than just a quote on the view towards compliance and/or tax planning, but your short and long-term view on reaching your objectives
- Setting the scene; What is your tax landscape, a first step in your 'Tax Control Framework'

Karl Berlin, Vice President, Head of Tax, **Ørsted A/S**

18.00 – Digitalisation of Taxation

- Road to automated tax processes
- Impact on reporting
- Operationalizing and automating tax controls
- Enhanced collaboration based on mutual benefits with the internal and external stakeholders of in-house tax
- Improve tax compliance processes for data collection and reporting requirements
- Cross-governmental and business cooperation
- Developments in OECD, EU

Arsalan Mahmood Hasan, Head of Taxes, Saudi Arabia, **Siemens**

18.40 – Closing Remarks from the Chair and End of Day 1
Drinks Reception sponsored by **Loctax**

Day 2, November 17, 2023

09.00 – Opening Remarks from the Chair
Johann Muller, Senior Transfer Pricing Expert

09.00 – The Best Approach to Value Chain Analysis

- Reviewing the formulaic approach to VCA
- Taking an empirical approach to VCA
- Going beyond classic transfer pricing techniques and looking at the entire business and its peers

Renata Ardous, Head of Global Transfer Pricing, **Chanel**

09.40 – Transfer Pricing Controversy and Audit Risks

- TP risk management strategies and recommendations
- The use of MAPs and APAs: insights and best practices
- Controversial TP methods and their risk profiles
- Dealing with audits: having your inter-group data and information ready to effectively defend your position

Giacomo Tassan-Din, Senior Director Transfer Pricing, **GfK, An NIQ Company**
Zuzanna Szubartowska, Transfer Pricing Expert, **Loctax**

10.20 – Finnish Tax Administration: Customer Orientation as a Strategic Priority Option

- Overhaul of the Finnish Tax Administration
- Customer orientation as a focal point
- Understanding the customer
- Measuring customer experience
- Developing and trimming the tax services in cooperation

Sami Koskinen, Director, Stakeholder Relations, **Finnish Tax Administration**

11.00 – Morning Coffee and Networking

11.30 – Case Study of the Implementation of the Italian Cooperative Compliance Program

- Key features of the Italian cooperative compliance model
- How to deal with the implementation and operation process
- Short/Medium/Long Term Pros & Cons
- ESG considerations for the taxpayer

Aaron Meneghin, Head of Group Tax, **Valentino**

12.10 – APAs and Advanced Rulings: Overview of the Current Dutch Ruling Practices

- How the Dutch ruling practice is organized (Unit International)
- Overview and update of unilateral APAs. (For example, a recent development is that the DTA is assessing whether it is possible to provide APAs for financial transactions)
- Overview and update of bilateral APAs
- Other activities that are part of the Unit International

Guney Bagislayici, Expert APA Team, **Dutch Tax Authorities**

Exhibition Sponsor: insightsoftware:

insightsoftware's Longview Tax solution suite enables multinational organisations to streamline their Tax Provision, CbCR, Pillar 2 and Operational Transfer Pricing processes

12.50 – Lunch

13.50 – Tax Issues for Digital-First Companies

- Challenges for SAAS companies
- Challenges faced by digital native businesses from the people who've experienced them first hand
- Current topical issues: digital reporting (e-invoicing), Data Sharing, DAC7, and more
- Future challenges to be aware of

Fritz van Riel, Tax Director Direct & Indirect Tax, **Genesys**
Karine Halimi-Guez, Vice President, Head of Tax, **Booking.com**

Zuzanna Szubartowska, Transfer Pricing Expert, **Loctax**

14.30 – ESG in Corporate Tax and Transfer Pricing

- ESG implications for your supply chain and intra-group
- Responsible Tax Management, Transparency and Different Stakeholders
- Transparency – key or a detail in responsible tax management?
- Having an open approach with transparency in our dialogue with governments around the world
- What detail about your tax model should be shared?

Alfredo Manero Ruiz, Directorate of Fiscal Affairs, **Repsol**
Christian Runge, Global Head of Transfer Pricing & Tax Technology, **Shell**

Marco Orlandi, Transfer Pricing Lead, **Shell**

Zuzanna Szubartowska, Transfer Pricing Expert, **Loctax**

15.10 – E-Commerce Issues within Corporate Tax

- Enabling finance efficiencies and minimising tax liabilities
- Enabling VAT calculation at digital point of sale
- Organising compliant invoicing and when needed e-invoicing
- Registering, reporting and filing with all tax authorities where they have sales
- Improving direct and indirect tax management within their internal systems/processes
- How this supports entering new markets, frictionless e-commerce and quantifiable success

Ali Özenli, Indirect Tax Manager, **PepsiCo**

15.50 – Closing Remarks from the Chair & End of Forum



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WHY YOU SHOULD ATTEND

Tax and transfer pricing leaders are faced with increasingly challenging group tax issues particularly due to extensive and unpredictable regulatory changes. Overall group tax management and structuring for complex transactions entails intensive financial and compliance obstacles in the current environment. Tax directors must take both technical and strategic approaches to managing the corporate tax position during these transactions. Tax authorities are requiring more documentation and consistency. And with many current and future initiatives being proposed by the OECD, new guidelines, limitations and national legislation are anticipated to take effect in the coming months. As a result, companies need to take a close examination of their financial payments, tax treaty use, PEs, and their digital assets. It is imperative to strengthen tax treatment of intangible assets including patents, know-how, R&D centres and transfer of marketing intangibles. Loss utilisation, profit repatriation and M&A financing strategies are priorities for contributing to tax efficiency. Data governance and the use of automation in tax processes and compliance is becoming more critical. And ESG initiatives and reporting need to be reflected in tax policy and documentation.

Attend this forum, the eleventh in our tax series to benchmark how other tax directors are implementing advanced tax planning strategies around the world; hear their perspectives - both success stories and lessons learned. Utilise this event to learn from their experiences, compare solutions and take away concrete strategies that you can use to drive strategic transformation in your enterprise

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