

EU - U.S. Tax Relationship: Contest or Dialogue?

*Friday 9 March 2018
Milan, Italy*

L&P

*Under the
patronage of*



**EU - U.S. Tax
Relationship:
Contest
or Dialogue?**

The tax reform approved by the Trump administration in December 2017 marks the major overhaul of the US tax Code in the last decades.

The new law represents the culmination of a lengthy process which may either pave the way for multinational enterprises to establish (or increase) their presence in the US or to change their supply chain models.

To this end, it is important to understand where the US Reform places itself within the international tax framework as the new regulations require a deeper understanding on how their implementation will affect the relationship with the tax administrations of emerging economies, as well as with the European Union.

In this latter regards, the EU Commission initiative in the field of State Aid may be perceived as a challenge to US Multinationals operating in Europe and it can play a role in determining the outcome of the relations between the stakeholders. In addition, different set of rules may cause uncertainties and possible instances of double taxation, which can be solved only by having an effective array of dispute resolution mechanisms in place.

All the above topics will be discussed by renowned international experts, ranging from international organisations, tax administrations, multinational enterprises and private practice, and, during the international conference organized by L&P - Ludovici Piccone & Partners - under the aegis of the Italian Branch of the American Chamber of Commerce. The event will feature an in-depth discussion of the key features of the US Tax Reform, together with the expected reaction to it by foreign multinationals and tax administrations.

Moreover, specific sessions will be devoted to the EU Commission initiative on State Aid cases in the field of taxation, together with the analysis of the legal instruments available to solve international tax disputes.

Introductory Remarks

- *Marzia Francisci*, General Counsel, American Chamber of Commerce in Italy
- *Paolo Ludovici*, L&P - Ludovici Piccone & Partners
- *Jeffrey Owens*, Director of the WU Global Tax Policy Centre

The US Economic Policy under the Trump Presidency

- *Patrick C. Costello*, Director Washington External Affairs Council on Foreign Relations

The current status of the Trump tax reform, the impact on international tax policy and the reaction of US MNEs

- *Andrew P. Solomon*, Sullivan & Cromwell LLP
- *Sam Maruca*, Covington and Burling LLP

The International Reaction

- *Tim Brierley*, Global Tax Director, SABIC
- *Vieri Ceriani*, Advisor on Fiscal Policies to Italy's Minister of Economy and Finance; Chief Executive Officer, SOSE
- *Fred Lo*, VP, Global Head of Tax, Yanfeng Global Automotive Interiors
- *Xavier Oberson*, Professor in Swiss and International Tax Law at the University of Geneva
- *Zahira Quattrocchi*, Group Tax Director, Barilla Group

Fiscal State Aid in Transfer Pricing Cases: a fight for the past to avoid battles in the future?

- *Max Lienemeyer*, European Commission, Head of Unit in charge of Tax Planning Practices
- *Alessandro Denaro*, European Commission, Unit in charge of Tax Planning Practices
- *Raffaele Petrucci*, Managing Director of the WU Transfer Pricing Center, Vienna University of Economics and Business

The US, the EU and International Dispute Resolution Mechanisms: what to expect now?

- *Thomas Eisgruber*, Head of Department, Taxation of Corporations, International Taxation and Audit, Bavarian Ministry of Finance
- *Carlos Perez Gomez Serrano*, Director of Transfer Pricing Audits, Mexican Tax Administration Service (SAT)
- *Giammarco Cottani*, L&P - Ludovici Piccone & Partners

Q&A and Closure of the Conference

By invitation only.

Friday 9 March 2018
9.00 AM – 5.00 PM
Palazzo Parigi, Milan (Italy)

By invitation only

RSVP

T +39 02 30 32 31 1
events@lptax.it

ludoviciandpartners.com

LUDOVICI PICCONE & PARTNERS

MILANO ROMA LONDRA