Day 1: Tuesday 9th February 2016: Room LC Festsaal 2 (Building LC, ground floor)

08:30-09:00  Registration at Room LC, Festsaal 2

09:00-09:15  Welcome Addresses by Michael Lang and Jeffrey Owens

09:15-10:30  Session I: An overview of the implementation of BEPS Actions which impact on information flows from MNEs to Tax Administration
This opening session will review the progress to date on implementing the CbCR, the Master and Global File on Transfer Pricing, Disclosure Provisions and the extent to which countries are using exchange of information clauses to access information held by their treaty partners on MNEs.

Speakers: Joe Andrus and Jeffrey Owens

10:30-11:00  Coffee break

11:00-12:30  Session II: Considering Secured Data Transfer, Storage and Use Models for CbCR Data
In October 2015, the OECD issued a call for tenders for the provision of a common data transmission system with a supplier to be selected in February 2016.

Link: http://www.oecd.org/callsfortenders/CFT%20common%20data%20transmission%20system%2020100001411.pdf

While the tender only discusses data transmission, and only common reporting standard data, it is believed it may play a role in CbCR data transmission as well. This leaves a potential gap in terms of data receipt, storage, use and workflow and surrounding integrated security, which are particular challenges for tax administrations in developing economies. Presently, there are several successful and effective models for secure confidential data transfer and in some cases secure storage and use between countries, which already operate world-wide for the transfer of restricted commercial and financial information. In this section, we will survey the most prevalent existing intergovernmental and financial data exchange/storage systems with a view towards highlighting best practice aspects that may be relevant for CbCR.

Speakers: Jonathan Leigh Pemberton

12:30-13:30  Lunch

13:30-17:00  Session III: Proposal for Secure CbCR Data Storage and Use: An Open Source Collaborative and Foundational Solution Targeted at Developing Nations
As explained in the conference pre-reading materials, WU and a select group of collaborators have developed a straw-man proposal on the technical and organizational aspects of an offering designed to secure and provide effective use of CbCR data, especially in developing economies. In this session, the basic tenants of the proposal will be reviewed, input will be reviewed, and a refined proposal and call for endorsement conversation will occur. Specifically, this part of the meeting will consider:

- How the solution will help address the concerns of taxpayers about the security of their data;
- Where countries will be relying on the system to meet the data security requirements laid down as part of the CbCR implementation package, what this implies in terms of their ability to access, or simply view data on the system;
- What, if any, analytical capabilities should be delivered by, or hosted on the system.

Speakers: Rainer Waechter and David Deputy
Vienna, 9-10 February, 2016

Content & Structure

Day 2: Wednesday 10th February 2016: Room LC Festsaal 2 (Building LC, ground floor)

09:00-10:30  Session IV: Review and Confirmation of the conclusions from Sessions II & III. There will be an opportunity to review the outcomes of the discussions on the first day and to confirm that the needs of stakeholders were correctly identified in Session II and the design principles developed in Session III are valid.

10:30-11:00  Coffee break

11:00-12:30  Session V: Levelling the Economic Playing Field: Exploring new information sources that would facilitate sustainable growth in developing countries
A discussion of how developing countries can make effective use of the new information to address legitimate tax risks, while also promoting sustainable economic growth, and minimizing the compliance burden and in order to encourage foreign direct investment flows.

Speakers: Duncan Onduru, Marcio Verdi and Jeffrey Owens

12:30-13:30  Lunch

13:30-14:30  Session VI: Facilitating Tax Cooperation Partnerships: Transforming Tax Adversaries into Contributors by fostering Trust
As Tax Administrations get more information from CbCR, the Master and Local Files, Exchange of Information and Disclosure Provisions, this may open the door to changing the nature of the dialogue between them and MNEs. This session would build upon work initiated by WU Vienna last September on moving forward on the Cooperative Compliance agenda. It will examine how to foster enduring and cooperative mutual trust and confidence between taxpayers and tax administrations in order to improve compliance and enhance corporate stewardship and taxpayer relations in global tax cooperation.

Speakers: Jonathan Leigh Pemberton, John Njiraini and Giammarco Cottani

14:30-16:00  Session VII: From Organization to Next Steps – A Stakeholder roundtable on the creation of a Foundation to promote and sustain CbCR Data Security and Use
A stakeholder roundtable session to deliberate the crafting of a supported framework proposal, construct a business model, structure ownership and governance of a foundation-type entity and its continual operations in the near future.

Panel Discussion with: Jeffrey Owens, Jeff Westphal, Kim Jacinto-Henares, Nancy Perks, Marcio Verdi and Hafiz Choudhury

16:30-17:00  Coffee Break (this will be held at the Lounge, at Building D3. 2nd Floor, just before the Fire Side Chat)

17:00-18:00  Fire Side Chat at The Institute Library with Jeffrey Owens and Stig Sollund

18:30  Cocktail Reception at The Institute Library
We are delighted to invite you to the opening of the Global Transfer Pricing Conference.
LIST OF PARTICIPANTS

Participant                      Affiliation

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