



**5<sup>th</sup> ANNUAL**  
**CORPORATE TAX SUMMIT**

SPEAKERS

**Charalambos Antoniou**  
Global Head of Tax Operations, Transformation  
& Risk Management  
Zurich Insurance Company, Switzerland

**Dr. Achim Pross**  
Head of the International Co-operation and Tax  
Administration  
OECD, France

**Dr. Adolf Poindl**  
Head of Group Taxes  
Megatech Industries GmbH, Austria

**Andrea Lee**  
Head of International Tax  
Erste Group Bank AG, Austria

**Dr. Raffaele Petrucci**  
Managing Director  
WU Transfer Pricing Centre, Austria

**Ivan Dimitrov**  
Group Tax Strategy, Transfer Pricing & Projects  
Deutsche Post DHL Group, Germany

**Harm J. Oortwijn**  
Senior Manager, Tax  
Whirlpool Corporation, Italy

**Andrei Belinski**  
Head of International Tax  
Centrica, UK

**Tim Mathey**  
Director European Tax  
Electronic Arts, Switzerland

**Stanislava Manolova**  
Tax Manager  
PORR AG, Austria

**KEY TOPICS**

- CbCR, ICAP and the Global Tax Certainty Agenda
- Taxation of the Digital Economy
- Centralisation of the Corporate Tax Function
- Automation and the Changing Role of Tax Executives
- Tax Audit Management and the Future of Cooperative Compliance
- Permanent Establishment Risks for a Multi-National Group
- Transfer Pricing and Business Restructurings in Light of Digitalisation

**TESTIMONIALS**

**"Excellent opportunity to share ideas and exchange views with others. I especially enjoyed the interactive lunch as a platform to also discuss in a smaller round. Thanks for the informative conference!"** -- Tax Expert – Global Transfer Pricing, OMV, Austria

**"Very good experience! Good crowd of people and a lot of interaction!"** -- Senior manager, TP, WTS, Germany

**"Good panel of speakers and high level of presentations."**  
-- Group Tax Manager, FERRERO, Luxembourg

**"Very good experience, a lot of opportunity for networking, practical insight."** -- Director European Tax, Electronic Arts, Switzerland

Berlin, Germany



08:30 Registration &amp; morning coffee

08:45 Welcome &amp; opening remarks from the chairman

**OPENING & KEYNOTE ADDRESS****RECENT DEVELOPMENTS IN CORPORATE TAX**09:00 **Transfer Pricing and Financial Transactions**

- Global transfer pricing developments
- Optimising the transfer pricing function
- Benchmarking – tricks and tips
- Implicit support vs. stand-alone rating

**Andrea Lee**

Head of International Tax

**Erste Group Bank AG, Austria**09:35 **CbC, ICAP and the Global Tax Certainty Agenda**

- CbC: First experiences on CbC and initial results, compliance and implementation of Action 13
- International Compliance Assurance Program: Status of ICAP
- Tax Certainty Agenda: Wider initiatives such as better access to MAP, MAP status, arbitration, APA programmes

**Dr. Achim Pross**Head of the International Co-operation and Tax Administration  
**OECD, France**10:10 **The Macroeconomic Impact of the US Tax Reform**

- Effects on inbound and outbound foreign direct investment in the EU
- Effects on tax planning strategies of MNEs
- Possible relocation of IP into the USA
- Possible effects on tax competition worldwide
- Changes to double taxation treaties

10:45 – 11:25 Morning coffee &amp; networking break

11:25 **Tax Transparency – Minimising Reputational Risk**

- Tax planning for compliance and reputation
- Understanding triggers for tax audit
- Managing and resolving disputes

**Charalambos Antoniou**Global Head of Tax Operations, Transformation and Risk Management  
**Zurich Insurance Company, Switzerland**12:00 **Permanent Establishment Risks for a Multinational Group – a 2018 view**

- New landscape - BEPS recommendations and MLI
- Old issues in the new environment
- High mobility workforce
- Operating a global matrix structure
- New issues
- Quest to tax value – digital PEs
- Lower PE threshold – “trading with” and “trading (with)in” the country
- PE risk assessment
- PE risk management

**Andrei Belinski**Head of International Tax  
**Centrica, UK**

12:35 – 13:35 Networking lunch

**TECHNOLOGICAL DEVELOPMENTS IN CORPORATE TAX**13:35 **Transfer Pricing & Business Restructurings in Light of the Digitalisation of Business Models**

- The role of digitalisation in changing operating models
- Effectiveness and efficiency of global compliance and reporting
- Tax audit and controversy management
- Internal control and remediation
- Automation and the management of tax function operating costs

**Dr. Raffaele Petruzzi**

Managing Director

**WU Transfer Pricing Centre**14:10 **Taxation of the Digital Economy**

- Value generation for digital companies
- New technologies and broader tax challenges
- Attributing value to collection and monitoring of data
- Legislative proposals targeting digital channels and new technologies
- Impact on other MNEs

**Tim Mathey**

Director of European Tax

**Electronic Arts, Switzerland**

14:45 – 15:25 Afternoon coffee &amp; networking break

15:25 **Tax Audit Management and the Future of Cooperative Compliance**

- Underscoring the need for automation of audit processes
- Centralising audit documentation
- Creating a standard, organized approach
- Automation and efficiency
- Mutual agreement procedures in managing disputes

**Dr. Adolf Poindl**

Head of Group Taxes

**MEGATECH Industries GmbH, Austria**16:00 **Centralisation of the Corporate Tax Function**

- Developing centres of excellence
- Spotlighting the provision of service
- The need for shared trust between entities (corporation, shared service centre & the tax department)
- Maximising efficiency
- A focus on the security of sensitive data

**Harm J. Oortwijn**

Senior Manager, Tax

**Whirlpool Corporation, Italy**16:35 **Closing remarks from the chairman**16:50 **Cocktail reception and after conference networking**

08:30 Re-registration & morning coffee

08:45 Welcome & opening remarks from the chairman

## OPENING ADDRESS

### AUTOMATING TAX FUNCTIONS

09:00 Automation and the Changing Role of Tax Executives

- Working effectively with technology
- Data science, analytics and the evolving skillset
- Soft skills and interaction with other business functions
- Meeting the increasing requirements of the tax function
- Leadership and the future tax professional

**Stanislava Manolova**  
Tax Manager  
**PORR AG, Austria**

09:35 Recent Developments in BEPS Implementation

- Approaches adopted by member jurisdictions
- Peer reviews and dispute resolution
- Reportable cross-border arrangements
- Optimisation of CbC reporting

10:10 Taxation of Cross-Border Mergers & Acquisitions

- Recent developments
- Choice of acquisition vehicle
- Choice of acquisition funding
- Other considerations

10:45 – 11:25 Coffee & networking break

11:25 Digitalisation and a Shift Towards Real-Time Tax Compliance Monitoring

- Data flow into the tax function
- The evolution of standards in real-time data sharing
- Legal and technical compliance
- Global adoption of real-time information sharing systems
- Preparing for detailed data sharing

### THE FUTURE OF CORPORATE TAX FUNCTIONS

12:00 Digitalisation and an Increased Focus on Identifying Real Value Drivers

- The importance of value chain analysis post BEPS
- Identifying sources of value creation
- Complying with the OECD's Transfer Pricing Guidelines
- Structuring your value chain
- Minimising risk of non-compliance and audit

12:35 – 13:40 Strategic interactive lunch

Interactive lunch, where participants will be discussing pre-selected topics in small groups, with the contribution of a table moderator to make the discussions more energetic

13:40 – 14:00 Conclusions from the interactive lunch discussions - continued in the conference room

Table moderators who took part in the discussions will give a short overview of what was discussed during the interactive lunch

14:00 Taxation of IP & Hard-to-Value Intangibles Post BEPS

- Developments in taxation for IP & HTVI
- Overcoming uncertainty surrounding taxation of IP
- Centralised ownership of IP
- Tax and compliance considerations of IP ownership structures

**Ivan Dimitrov**  
Group Tax Strategy, Transfer Pricing & Projects  
**Deutsche Post DHL Group, Germany**

14:35 Future Developments in Corporate Tax

- Development of corporate tax revenue in the EU
- Pushing for fundamental reform of international tax rules
- Taxing profits in the digital economy
- Common Consolidated Corporate Tax Base
- Providing a fair framework for taxing all businesses in the future

15:00 PANEL DISCUSSION

*Moderated by:*  
**Roderick Sayers**  
Independent Tax Expert

15:30 Closing remarks & chairman's summary

15:40 Post conference coffee break and end of conference



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Full Name:

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## REGISTRATION

Conference registration fee	Expires	Price
Early bird discount*	30.5.2018	€1590 +19% VAT
Full price*		€1990 +19% VAT
Conference materials only (free of charge for registered delegates) +21% VAT for Czech companies only		€500

\*Fee includes conference materials, refreshments during the 2-day event and all service charges.

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## WITH THANKS

I would like to thank everyone who assisted with the research and organisation of this forum, particularly the speakers for their support and commitment.

**Keegan Trace**, Conference Producer

tel. +420 226 220 460 | email: keegan@uni-global.eu

## Accommodation

Hotel accommodation and travel expenses are not included in the registration fee.

## UNIGLOBAL

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