Registration & Coffee
08:30 - 09:00

**HMRC Whispering – the PDCF & navigating your way through DPT/TP challenges in the UK**
09:00 - 12:00

This interactive workshop will provide you with technical information, examples of practical experience, and guided case-study material for finding a way through, or pre-empting, potential DPT or TP disputes in the UK, including when and how to use the PDCF.

Topics will include:
- How and what HMRC is looking for as targets
  - A check-list
  - Case-study
- The Profit Diversion Compliance Facility
  - Why bother?
  - What you need to do immediately
  - Drafting a plan and time-line
  - What you need to do if registering
  - Triangulation and how to pitch a proposal
  - Penalties
- What to do if there is an enquiry
  - Key elements for managing the process
  - How to benefit from the alternative dispute resolution (ADR) mindset
  - Potential pitfalls: the echo-chamber effect, miscommunication, HMRC internal processes
- Penalties reconsidered
- MAP/APAs/re-structuring

The course will be led by Rupert Shiers and Graham Poole of Hogan Lovells. Rupert Shiers has worked full time in resolving tax disputes for nearly twenty years, and has been top ranked in Chambers and Partners since 2008. He is a long-standing member of Chartered Institute of Taxation's Management of Taxes Sub-Committee, addressing the law and practice of interactions with HMRC. Graham Poole has twenty years’ experience of transfer pricing roles in industry and private practice, and was HMRC’s senior transfer pricing economist from 2014 to 2016, working on many of their most difficult transfer pricing enquiries. He is a Fellow of the Chartered Institute of Taxation.

**Participants**

Graham Poole - Senior Director - Economics & Transfer Pricing, HOGAN LOVELLS
Rupert Shiers - European Head of Tax Disputes, HOGAN LOVELLS
<table>
<thead>
<tr>
<th>TIME</th>
<th>Event</th>
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<tbody>
<tr>
<td>08:00</td>
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Quickfire Round: Ask The Policy Makers
10:40 - 11:00
Don't miss your opportunity to put your questions directly to our panel of leading tax authorities and policy makers. They will try to address as many of your questions as possible during this session and we would like to remind you these can be submitted in a number of ways. You can:
- Ask for the microphone and put your questions live to our panel on stage
- Submit a question through our event app and have this answered in real time
- Tweet us your question using the hashtag #ITC19
- Email a complex question in advance to charlotte.hawkesparker@informa.com so this can be addressed by our experts at the event having given it careful consideration in the run-up to the event

Participants
Timothy Power, HM TREASURY
Nina Legaard Kristensen, Head of Unit, DANISH MINISTRY OF TAXATION
Ksenija Cipek, Assistant Director General for Legislation and International Cooperation, MINISTRY OF FINANCE CROATIA, TAX ADMINISTRATION
Melissa Dejong, Head of Unit, OECD

Morning Coffee
11:00 - 11:20

The Digital Tax Agenda: are we closer to reaching a global consensus?
11:20 - 12:10
- Latest OECD discussions
- The UK’s digital tax position
- The EU’s stance
- Latest policy implications on businesses
- Working to reach a global solution; how can the industry shape the future?

Participants
Clara Coudert, International Tax, KERING
Glyn Fullelove, President, CIOT
Lee Holloway, Head of Tax, NEXT
Xiaoshan Sun, Lead for Tax Innovation, UNILEVER
Richard Syrett, Managing Director, ALVAREZ & MARSAL

Business Restructuring: How to handle a global scaled acquisition
12:10 - 12:50
- A match made in heaven and yet some real operational complexities
- The tax technical transformation: global structure and new operating model
- The tax viewpoint of the integration journey

Participants
Karine Halimi-Guez, Managing Director, Tax, FEDEX

Death of the EU VAT Return
13:50 - 14:30
- Closing the €150bn EU VAT gap
- Live invoice reporting success stories: Hungary, Spain and Italy
  - Where next? Greece and Portugal
- UK’s MTD for VAT and real-time reporting
- EU 2019 e-invoice for B2G
- Copying tax regimes in Brazil and China

Participants
Richard Asquith, VP Global Indirect Tax, AVALARA

Tax of IP & Intangibles
14:30 - 15:10
- IP migration in wake of US tax reform
- Patent box regimes worldwide
- Taxing offshore IP income

Participants
Anna Burchner, Partner Tax, CMS
Marta Pankiv, Senior Tax Manager, Group Tax and Transfer Pricing, TRICENTIS
David Campkin, VP International Tax, DAZN

Afternoon Coffee
15:10 - 15:30
Culture eats strategy for breakfast
15:30 - 16:00
• Building a tax control framework
• Enforcing standard processes in the tax function
• Stakeholder engagement – from C-Suite to AP Users
• Fostering the right culture for tax a ‘Centre of Excellence’

Participants
Andrew Bohnet - Founder, INNOVATE TAX

Global Transfer Pricing Developments: Financing, CbCR & BEPS
16:00 - 16:50
• Where are we after BEPS?
• Preparing for the second wave of CbCR
• The OECD’s discussion draft on transfer pricing aspects of Financial Transactions

Participants
Johann Müller - Senior Transfer Pricing Specialist, COLOPLAST
Ryan Rubianes - Head of Transfer Pricing, SANDVIK
Erik Knijnenburg - Global Head of Tax & TP, H&M
Deyan Mollov - Senior Director, ALVAREZ & MARSAL

Chairs’ Closing Remarks and Drinks Reception
16:50 - 17:50
<table>
<thead>
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Registration & Coffee
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Chair’s Opening Remarks
09:00 - 09:10
Participants
Marvin Rust - Managing Director, Head of A&M Tax in Europe, ALVAREZ & MARSAL

View from the Courts
09:10 - 09:45
• How are the courts approaching tax cases in 2019?
Participants
David Milne QC - Barrister, PUMP COURT TAX CHAMBERS

Controversy & Dispute Resolution
09:45 - 10:35
• The current international tax controversy landscape
• Joint audits and co-operation between tax authorities
• New ways of working, e.g. ADR and HMRC’s Profit Diversion Compliance Facility
• MAP and arbitration in international tax
• Best practice when resolving tax disputes
Participants
Anna Elphick - VP Tax, Global Markets, UNILEVER
Erik Kniijnenburg - Global Head of Tax & TP, H&M
Graham Poole - Senior Director - Economics & Transfer Pricing, HOGAN LOVELLS
Rupert Shiers - European Head of Tax Disputes, HOGAN LOVELLS

Morning Coffee
10:35 - 10:55

The Latest on EU State Aid
10:55 - 11:45
• The European Commissions latest stance on State Aid
• Recent cases and investigations
  • Nike
  • Gibraltar

Participants
Kelly Stricklin-Coutinho - Barrister, 39 ESSEX CHAMBERS
Max Lienemeyer - Head, Task Force Tax Planning Practices (DG Competition), EUROPEAN COMMISSION
Jan Weerth - Group Tax, DEUTSCHE BANK
Andrew Thomson - European Counsel, SULLIVAN & CROMWELL

Tax in the Boardroom: Governance and Transparency
11:45 - 12:35
• Managing investor relations and questions
• Tax under the spotlight; corporate reputation management
• Relationships with the tax authorities
• Publishing a tax strategy: Lessons learned
  • Can internal audits drive change within a business?
• The extent of exchange of information
• What steps should multinationals be taking in this new environment?

Participants
Jaime Salmerón Molina - Tax Manager, REPSOL
Mai Trinh - Director, global tax reporting, RELX
Clive Baxter - Head of Tax Governance and Policy, MAERSK
Christopher Mitchell - Managing Director, Head of UK Tax Services EMEA, BNY MELLON

Lunch
12:35 - 13:35

Indirect Taxes Around the World
13:35 - 14:25
• VAT in the GCC
  • disparities across GCC states
  • dealing with the government
• South Dakota v. Wayfair
  • international implications
• How are businesses adapting to new indirect tax regimes worldwide?
• Global VAT requirements on digital services
• Real time reporting compliance requirements
  • Russia’s new VAT rules

Participants
Joanne Clarke - Tax Director (VAT), PINSENT MASONS
Damon Lambert - Head of European Taxes, SWISS RE
Carolin Symmons - Senior Indirect Tax Manager, SPOTIFY
Jason Collins - Head of Tax, Litigation and Regulatory, PINSENT MASONS

Rise of the Machines: Technology and the Tax Function
14:25 - 15:15
• In-house and advisor relationships
  • What do tax functions expect from their advisors?
  • Mandatory disclosure rules
• The use of technology on the modern day tax function
• Dealing with an increased compliance burden on a limited budget
• What we want to see from technology solutions?
  • where can they improve existing products on the market?

Participants
Mariano Giralt - Managing Director, Head of Global Tax Services, BANK OF NEW YORK MELLON
Ken Chan - Head of Tax, TRANSFERWISE
Carolin Symmons - Senior Indirect Tax Manager, SPOTIFY
Jamie Eagan - VP Product Management - Tax, LONGVIEW

Afternoon Coffee
15:15 - 15:35
Tax of M&A Transactions
15:35 - 16:25

- Structuring your transaction to ensure that it is:
  ◦ financially & commercially efficient
  ◦ focused on strategic priorities
  ◦ progressed with the urgency a deal often requires
- Risk-focused tax due diligence:
  ◦ assessing your material exposure
  ◦ acquisition & vendor due diligence reviews
  ◦ post-acquisition savings
- Contract assistance:
  ◦ review & negotiate the tax aspects of deal agreements
- Tax structuring

Participants
Liz Rand - Head of Tax Structuring & M&A, VODAFONE
Noah Gaoua - Head of Group Tax, NOVARES
Andrew Wood - Tax Lead M&A and Structuring, SHELL

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