

Global Tax Controversy - Workshop for Corporates

TPA Global is facilitating a workshop on 'global tax controversy' for corporate taxpayers where a team of globally renowned, independent specialists (with wide-ranging experience in value chain analysis, arbitration, mediation, litigation and tax rulings, are invited to discuss these issues with corporate taxpayers in an interactive workshop setting.

At the workshop, the corporate taxpayers will have a chance to interact with each other and with specialists dedicated to dealing with global tax controversy through 8 mini workshops of one hour each. Each mini workshop will be facilitated by 2 specialists, where, at first a brief introduction of the issue will be presented and thereafter three broad statements on how to tackle the issue including latest case references will be discussed in an open platform with corporate attendees.

www.tpa-global.com/gtc2018

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Venue and Date

Amsterdam
Courtyard Marriott Amsterdam Airport

21 June
2017, Thursday

We would like to invite you to our event on

Global Tax Controversy - Workshop for Corporates

To be held on the 21st of June 2018 in Amsterdam, The Netherlands.

The BEPS Action Plans, in an attempt to tackle extreme cases of tax evasion, have inevitably blurred the line between *strategic* tax planning and *fraudulent* tax evasion for corporate taxpayers. This, coupled with latest publications of the OECD on 'Fighting Tax Crime' where taxpayers' rights find a bleak mention as '*suspects' rights*' has given force to many governments to enact a number of aggressive (and often, unjust) regulations. This is evidently setting the scene for increasing tax controversy at a global level.

Every taxpayer, who wants to still be "in control", needs to be aware of:

- The toolbox of dispute avoidance and resolution instruments available at its disposal (ranging from safe harbours, bilateral and unilateral APAs, MAP procedures, ICAP processes, ISO certification, mandatory binding arbitration, mediation, and litigation, among others); and
- The applicability of each of these dispute management instruments to different parts of its value chain as well at different stages of the dispute (for example, an APA is more appropriate as a preventive mechanism for gaining certainty on a broader spectrum of operations while a MAP resolution provides an immediate resolution to issue at hand).

Therefore, TPA Global is facilitating a workshop on 'global tax controversy' for corporate taxpayers where a team of globally renowned, independent specialists (See www.gtc-global.org for more details of the speakers) with wide-ranging experience in value chain analysis, arbitration, mediation, litigation and tax rulings, are invited to discuss these issues with corporate taxpayers in an interactive workshop setting.

At the workshop, the corporate taxpayers will have a chance to interact with each other and with specialists dedicated to dealing with global tax controversy through 8 mini workshops of one hour each. Each mini workshop will be facilitated by 2 specialists, where, at first a brief introduction of the issue will be presented and thereafter three broad statements on how to tackle the issue including latest case references will be discussed in an open platform with corporate attendees.

In the last hour of the session, the attendees are provided an opportunity to discuss any specific issues that they may be facing with a specialist of their choice at an individual level.

For more information on the agenda and the topics of the workshops, along with practical details of the Event, please refer to the following link:

<https://www.tpa-global.com/gtc2018>

Time (CET)	Topic	Presenter
09.00 - 10.00	Introduction to the Workshop	
10.00 - 11.15	Workshop 1 - "Controversy management for shareholders" - Case Study: Caterpillar Workshop 2 - "Controversy management for treasury companies" - Case Study: Chevron	Daniel Erasmus Frank Herreveld Steef Huibregtse Mukesh Butani
11:15 - 11:45	Break	
11:45 - 13:00	Workshop 3 - "Controversy management in the EU" EU Commission investigation in Apple, IKEA etc. Workshop 4 - "ICAP my global tax risks" How letters from governments entering the ICAP could immediately lower global tax risk profile	Hans van den Hurk To be announced
13:00 - 14:00	Lunch	
14.00 - 15.00	Workshop 5 - "Controversy resolution instruments available at hand" APAs/ MAP and Binding Arbitration Workshop 6 - Controversy management instruments at hand - Value Chain Analysis - Case Study: Apple Inc.'s operational vs. tax structure	To be announced Jakob Bundgaard Steef Huibregtse
15:00 - 16:00	Workshop 7 - Controversy management and effective communication - Best practices - Case study: Rio Tinto Workshop 8 - Controversy management – Journey Towards full control - Habitual mistakes of taxpayers - How to be fully in control - Case study: Gucci	To be announced Hans van den Hurk Daniel Erasmus
16:00 - 16:30	Break	
16:30 - 17:00	Conclusive remarks	
17:00 - 18:00	Opportunity for individual client specific sessions	

Meet our presenters

DANIEL ERASMUS



Daniel is a US Tax Court Practitioner, an International Tax Attorney, and Tax Counsel in Africa – with an excellent track record on tax cases – just over USD\$ 3,5bn tax controversies where taxpayer clients have paid out less than 3% on taxes claimed (on average). He has been a leading pioneer in the advancement of developing a system of tax risk management to circumvent the adversarial nature of tax controversies with tax authorities.

Specialism:

Tax Audits, Tax Risk Management, Controversy & Litigation

Regions:

USA, and African jurisdictions;

FRANK HERREVELD



Frank has over 25 years of experience as an all-round tax adviser. His broad expertise encompasses a large part of the Dutch tax law, with an emphasis on (corporate) income tax and formal tax law. From 2001 to 2015, Frank was tax partner with Deloitte Tax Advisers, during which he chaired the Tax Controversy Group and was a commissioner between 2010 and 2012.

Specialism:

Medium and large sized family owned businesses, Tax audits, Tax litigation, Mergers and acquisitions, Risk management and governance

Regional expertise:

Europe

HANS VAN DEN HURK



Hans van den Hurk served as an international tax partner with Andersen and Deloitte in the Netherlands. From August 1, 2014, he commenced with Cygnus Tax, which is an independent boutique firm specialized in international tax strategy and tax policy. Part of this is also running court cases. Hans has brought several cases to the Dutch courts and has also won several cases with the European Court of Justice.

Specialism:

European Law, Tax Law, Mediation, Litigation

Regional Expertise:

European and International Courts

JAKOB BUNDGAARD



Jakob Bundgaard is a founding partner and managing director of CORIT Advisory and formerly a partner of a Big Four. Jakob advises broadly on tax law matters and possesses a special expertise within the field of international tax law, including EU-law. Expert on company and group taxation, international tax law, including EU-law, financial instruments, private equity, energy and digital businesses.

Specialism:

International/EU Tax Law Advisor, Expert on Company and Group Taxation, International Tax Law, Private Equity, Energy and Digital Businesses

Regional Expertise:

European and International Courts

JENS BRODBECK



Jens Brodbeck is an executive at ENSafrica in the tax department. He specialises in corporate international tax, with a specific focus on transfer pricing, inbound investments and cross-border tax planning. He has been involved in transfer pricing since the introduction of the South African transfer pricing rules in 1995, assisting international and South African multinationals with their transfer pricing needs. Involved in transfer pricing dispute resolution matters in various industries, such as automotive, gas, mining, oil and retail

Specialism:

Corporate International Tax, with a specific focus on Transfer Pricing, Inbound Investments, Cross-border Tax Planning, Exchange Controls

Regional Expertise:

South Africa and other African jurisdictions

MUKESH BUTANI



Mukesh is the founder of BMR Legal and independent law firm specializing in Tax policy, Advocacy & Disputes that has been ranked amongst Tier 1 tax firms in India in independent surveys. Mukesh co-founded and was Chairman of BMR Advisors, amongst India's leading professional services firm. With specialisation in corporate international tax and transfer pricing for over three decades, Mukesh has significant experience in advising Fortune 500 multinationals and large Indian business houses on a wide range of matters relating to trade & investment policy, business re-organisations, cross-border tax structuring, corporate international tax and controversy across a range of sectors.

Specialism:

Corporate International Tax and Transfer Pricing, dispute resolution

Regional expertise: India, Asia

STEEF HUIBREGTSE



Steef has more than 30 years of experience in the area of value chain analysis, transfer pricing strategy, risk management, design, documentation and implementation. Recently, he has been acting as expert witness and is heavily involved in presentations to management boards. Steef has designed and implemented BEPS proof TP Governance and Operating models for MNEs

Specialism:

Value Chain Analysis, Transfer Pricing Strategy, Risk Management, Design, documentation and implementation, APAs, Expert witness

Regional Expertise:

Netherlands, Europe



TPA Global provides international businesses with integrated and value-added solutions in improving financial performance, operational efficiency, strategic development and talent coaching through a cross-border and cross-discipline team of professionals which identifies the right solutions for customers and targets; efficient and streamlined advisory and implementation processes which cut through operational complexities across functions and borders; and superior customer service and support which proactively anticipate the evolving needs of the clients.

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