



Taxand Global Conference 2010

• Partnering for Client Success

April 14-16, 2010
Grand Hyatt, Berlin, Marlene-Dietrich-Platz 2
10785 Berlin, Germany

Programme at a Glance

Tuesday, April 13

1800 – 2100 Registration & Information Desk Open

Wednesday, April 14

0730 - 2000 Registration & Information Desk Open
0900 - 1100 ••Taxand Board Meeting
1100 - 1500 ••Taxand Global Executive Committee (GEC) Meeting
1400 - 1600 ••Taxand Service Line, Marketing & Knowledge Meetings
1530 - 2200 ••Speaker Rehearsals
1900 - 2200 •Welcome Reception, Dinner
••Bespoke Client Meetings throughout the day

Thursday, April 15

0700 - 1830 Registration & Information Desk Open
0700 - 0930 •Breakfast Buffet
0830 - 0930 ••Taxand Plenary (Taxanders only) - Vision presentation by Frédéric Donnedieu de Vabres, Taxand Chairman
0930 - 1000 Coffee Break
1000 - 1015 Welcome & Introduction – Ulrich Siegemund, Germany
1015 - 1130 **Plenary Session I – Tax Planning and its Limits in the Current Climate**
1130 - 1230 **Plenary Session II – The Impact of Indirect Tax Change Worldwide**
1230 - 1330 •Lunch Buffet
1330 - 1500 **Plenary Session III – Using Transfer Pricing to Plan Ahead**
1500 - 1600 **Keynote Speech – Increasing Public Debt – Is Inflation around the Corner? –Dr. Ralph Solveen, Dep. Head of Economic Research, Commerzbank AG**
1600 - 1800 **Taxand Expo** – Visit stands of Taxand's countries and a Bar
••Bespoke Client Meetings throughout the day
1830 - 1930 •Bus transfer to Evening Event
1930 onwards •Dinner

Friday, April 16

0730 - 1700 Registration & Information Desk Open
0700 - 0900 •Breakfast Buffet
0900 - 1000 **Plenary Session IV – M&A Structuring in a Challenging Economic Environment**
1000 - 1030 Coffee Break
1030 - 1200 **Client Panel Discussion – How New Political Pressure is Affecting Multinationals' Tax Strategies** – Including Dr. Michael Kröner, Head of Tax, Deutsche Bank; Hartmut Wolter, Head of Tax, Deutsche Lufthansa; Guy Renard, VP of Tax, Schneider Electric; Angel Martin, Global Tax Director, Telefonica, moderated by Taxand Board members.
1200 - 1230 Closing Remarks – Frédéric Donnedieu de Vabres, Taxand Chairman
1230 - 1330 •Lunch Buffet
••Bespoke Client Meetings throughout the day

• All delegates welcome •• By invitation only



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Plenary Sessions Descriptions

All sessions will present a global view and will be given by a cross-section of Taxanders from around the world.

Thursday, April 15 2010

Plenary Session I – Tax planning and its Limits in the Current Climate

Chair: Ricardo Gómez, Spain

Mukesh Butani, India; Ernie Perez, US; Olivier Vergniolle, France

The limits applied to tax planning have become more restrictive of late. A raft of anti-abuse measures has been introduced to tax legislation in key jurisdictions around the world. Governments are now looking at what their next-door neighbours are doing and starting to copy the approaches that seem to be working.

This session will focus on the hottest anti-avoidance topics facing multinationals. We will be sharing examples of tax planning vehicles that are particularly frowned upon and revealing the main areas under scrutiny by tax authorities. By assessing the current legislative framework in jurisdictions on several continents, we will present a global view of the latest issues and an understanding of what to expect in key territories in the future.

Practical advice will be provided to help multinationals mitigate the risks associated with tax planning limits. Best practice will also be shared to exemplify effective tax governance in the current climate.

Plenary Session II – The Impact of Indirect Tax Change Worldwide

Chair: Laurent Grencon, Luxemburg

Rajeev Dimri, India; Henk Hop, Belgium; Mark McCormick, US

Reduced rates of VAT to stimulate economies, followed by increases to claw back the deficit, mean tax authorities are under pressure to collect. At the same time multinationals are coping with increased administrative costs of compliance.

Taxand's Global Indirect Tax Team will brief you on recent developments in Europe, the Americas and Asia including case law affecting VAT recovery on acquisitions and disposals and the commercial impact of the 2010 VAT package as well as how to reduce compliance costs.

Plenary Session III – Using Transfer Pricing to Plan Ahead

Chair: Antoine Glaize, France

Manuel Candal, Venezuela; Ramon Lopez de Haro, Spain; Dale Hill, Canada; Shiv Mahalingham, UK, Mike Murphy, US, Friedhelm Stock, Germany; Dennis Xu, China

Tax authorities are becoming more aggressive and more precise in their assessment of multinationals' transfer pricing policies. Economic downturn has forced organisational change – from site restructuring to product and staff rationalisation - to deliver cost efficiencies.



Our panel, representing Taxand's Global Transfer Pricing Team, will discuss how tax benefits can be enjoyed, by adapting transfer pricing policies, through updating documentation and financial benchmarks, reviewing payment flows, selling IP, ensuring loss sharing, negotiating APAs, reconsidering functional profiles and more.

Multinationals will discover pragmatic ways to use transfer pricing to plan ahead from attending this plenary.

**Keynote Speech – Increasing Public Debt – Is Inflation around the Corner?
Dr. Ralph Solveen, Dep. Head of Economic Research, Commerzbank AG**

The worldwide financial and economic crisis has caused the State's deficit to go through the roof. Inflation may not be the immediate result, but in the long term the chance that prices will rise quickly has increased considerably. This particularly applies in the Euro zone, where the downturn has exposed multiple cracks.

Our Keynote Speech will cover some of these issues and their impact for multinational companies.

Friday, April 16, 2010

Plenary IV – M&A Structuring in a Challenging Economic Environment

Chair: Albert Collado, Spain

Denis Andres, France; Ian Fleming, UK; Martin Williams, USA

M&A activity is presenting some signs of recovery around the world. Strategic transactions are coming back after years of an M&A market dominated by PE Houses. However, transactions carried out in the past are being refinanced as multinationals face new economic challenges. Tax specialists from Taxand's Global Transaction Tax Team will discuss the latest issues and opportunities to consider in the countries where M&A deals are increasing.

Dealing with the tax challenges derived from refinancing pre-crisis high priced operations, analysing new tax trends in connection with the deduction of financing costs and optimising tax losses in an acquisition will be some of the topics to be covered in the session.

Client Panel Discussion - How New Political Pressure is Affecting Multinationals' Tax Strategies

Dr. Michael Kröner, Head of Tax, Deutsche Bank; Hartmut Wolter, Head of Tax, Deutsche Lufthansa; Guy Renard, VP of Tax, Schneider Electric; Angel Martin, Global Tax Director, Telefonica; Taxand moderators.

Tax Directors will discuss how political pressure is affecting their tax departments' strategies and how they are dealing with the challenges and opportunities they face today. Taxand Board members will moderate this session.