



| Time | Agenda |
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| 09.00 - 09.15 | Introduction |
| 09.15 - 10.00 | An update on the current TP landscape and developments within the OECD Speaker: Marlen Sáenz (OECD) |
| 10.00 - 11.00 | Hot topics in TP audits Over the recent years tax disputes in cross-border matters have increased rapidly. The development has been even more rapid in transfer pricing following the OECD BEPS work and updated OECD TP Guidelines. The panel will discuss the topical aspects recurring in transfer pricing disputes in different countries. The panel focuses on the issue through case examples and aims to offer a practical view to businesses and practitioners on transfer pricing aspects to take into account in one's daily work. Speakers: Einari Karhu (Taxand Finland); Michael Puls (Taxand Germany); Renáta Bláhová (Taxand Slovakia) |
| 11.00 - 11.30 | Coffee break |
| 11.30 - 12.15 | Country-by-country reporting team, Dutch Tax Authorities An update on country-by-country reporting and the impact of the exchange of information on Transfer Pricing. Speakers: Marcel Hanibals and Willem-Jan van Veen |
| 12.15 - 13.30 | Lunch |
| 13.30 - 14.30 | Transfer Pricing regarding loans and financial instruments This panel will discuss the application of the arm's length principle to financial transactions, taking into account the OECD public discussion draft published in July 2018. The panel will provide an overview of the OECD suggested approach and its practical implications for taxpayers, as well as a comparison between the current practices applied in the UK, France, South Africa and Italy. Speakers: Stefano Bognandi (Taxand Italy); Deyan Mollov (Taxand UK); Anne Carole Chapuis (Taxand France); Andreas Medler (Taxand Luxembourg) |
| 14.30 - 14.45 | Coffee break |
| 14.45 - 15.45 | DEMPE - implications for Transfer Pricing regarding IP This panel will discuss the practical applications and difficulties faced in applying the DEMPE functions, specifically relating to the ownership of intangibles. It covers the definition of IP, the allocation of the economic ownership of IP based on the DEMPE and difficulties in applying DEMPE across industries. Speakers: Margaret Critzer (Taxand USA); Hendrik Blankenstein (Taxand Switzerland); Clemens Nowotny (Taxand Austria); Christina Storm (Taxand Germany) |
| 15.45 - 16.00 | Closing remarks |