



ICC's Commission on Taxation presents:

Transfer Pricing Documentation and Dispute Resolution: Making or Breaking the Corporate Tax

Date: 28 April 2010

Venue: International Chamber of Commerce
38 Cours Albert 1er, 75008 Paris, France

Objective

Most transfer pricing conferences focus on methods, and how to apply the arm's length standard. This unique ICC one-day seminar looks instead at the practical issue of transfer pricing documentation and its role in dispute resolution. The documentation burden in transfer pricing has grown in volume and spread across the globe. Conflicting and cumulative requirements have become a significant challenge for international business.

The goal of this seminar, bringing together government and business representatives, will be to examine the current state of transfer pricing documentation, its connection to dispute resolution mechanisms, and what the future may have in store.

Who should attend?

- Tax directors and tax counsels
- Transfer pricing practitioners in accounting and law firms
- Revenue officials
- Tax policy officials



International Chamber of Commerce
The world business organization

Policy and Business Practices

Wednesday, 28 April 2010

Transfer Pricing Documentation and Dispute Resolution: Making or Breaking the Corporate Tax

8:30 – 9:30 Registration and breakfast

Morning session

9:30 – 12:30

PANEL 1: Current State – What is the Reality Today

PANEL 2: The Role of Transfer Pricing Documentation

12.30 – 13.30 Lunch

Afternoon session

13:30 – 17:30

PANEL 3: Documentation and Dispute Resolution

PANEL 4: Options for a Global Model

Coffee break

PANEL 5: Future state – Where do we go from here?

SPEAKERS

- **Krister Andersson** – Chairman BusinessEurope Tax Policy Group and Head Tax Delegation for Swedish Business & Commerce, Confederation of Swedish Enterprise, Sweden
- **Mukesh Butani**, Partner, BMR Advisors, India
- **Robert Couzin**, Couzin Taylor LLP allied with Ernst & Young LLP, Canada
- **Stefaan De Baets**, Vice-Chairman of the EU JTPF and First Attaché of Finances of the Belgian Ministry of Finance, Belgium
- **Bruno Gibert** – Partner, CMS Bureau Francis Lefebvre, France
- **Renaud Jaune**, Chef de Bureau, Direction de la Législation Fiscale, Relations Internationales, France *
- **Theo Keijzer**, Vice President Tax Policy, Shell International B.V., The Netherlands
- **Shiraj Keshvani**, APA Program, Coordinator, Canada Revenue Agency, Canada *
- **Barbara Kessler**, Head of Group Tax and Insurance, Novartis International AG, Switzerland
- **Chris Lenon**, Global Head of Tax, Rio Tinto PLC, United Kingdom
- **Cym Lowell**, Partner, Gardere Wynne Sewell LLP, United States
- **Mayra O. Lucas Mas**, Advisor, Tax Treaty, Transfer Pricing & Financial Transactions Division, OECD, France
- **Alberto Pluviano**, Senior Transfer Pricing Advisor for EMEA Middle East and Africa, IBM, France
- **Harry Roodbeen**, Deputy Director for International Tax Policy & Legislation, Ministry of Finance, The Netherlands
- **Theo Schmit**, Executive Vice President Corporate Fiscal, Philips International B.V., The Netherlands
- **Philippe Thiria**, MEDEF's Representative to BIAC, Former Head of Tax, Unilever, France
- **Jean-Marc Tirard**, Partner, Cabinet Tirard Naudin, France
- **Sabine Wahl**, Member of the EU Joint Transfer Pricing Forum, France
- Government Representative *

* invited, to be confirmed

Wednesday, 28 April 2010

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TAX 180-28/04/10

Venue: International Chamber of Commerce (Conference room: 1,2,3)
38 Cours Albert 1er, 75008 Paris, France

Please complete the registration form and return by 21 April 2010 to:
Andrea Montégut Tel. +33 (0)1 49 53 28 57
Fax: +33 (0)1 49 53 57 95 E-mail: amu@iccwbo.org

I shall attend the "Transfer Pricing Seminar" on Wednesday, 28 April 2010 and will pay the below indicated registration fee : yes no

Registration fee: 190 euros per person

The registration fee includes conference documentation, breakfast, coffee-breaks and lunch. Travel and hotel expenses are not included.

Method of payment: payment to be made by credit card (*please indicate as appropriate*):

American Express Mastercard VISA

Card number:-----

Name of cardholder:-----

Expiration date: ----- Signature: -----

Cancellation charge: 50% of the registration fee will be refunded if notice of cancellation is **received in writing before Wednesday, 21 April 2010**. Cancellations after this date are not refundable.

Participant information: (*please print or type*)

Title (Mr/Dr/Mrs/etc.).....
Family name..... First/given name.....
Position
Company.....
Address.....
City/state..... Zip/postal code.....
Country E-mail.....
Phone (.....)..... Fax (.....).....

Please note that the number of seats in the conference room is limited. As they will be distributed on a "first come first served" basis, we recommend that you make your reservation ASAP and indicate the reference "TAX 180-28/04/10".

Registration form