

## INTERNATIONAL TAX SYMPOSIUM

6-8 May 2015, Intercontinental İstanbul Hotel, İstanbul, Turkey

### PROGRAM

Day 1

May 6, 2015

#### Time

#### Program

15:30-17:00

**Forum Registration**

Pick up badges, packet and materials

#### **Symposium Venue:**

InterContinental İstanbul Hotel

Asker Ocağı Cad No:1

34435 Taksim, İstanbul, Turkey

Phone Number: +90 (212) 368 4444

Website: <http://istanbul.intercontinental.com.tr>

18:00-20:00

Welcome Reception: Addressed by Mr Erol Öz, *Director General*,  
Ministry of Finance, Turkey

Bosphorus Hall

**Day 2**

**May 7, 2015**

**08:30-09:00 Forum Registration**

Pick up badges, packet and materials

**09:00-09:30 Opening Address**

- Mr Masatsugu Asakawa, *Chair of CFA* , OECD
- His Excellency Mr Mehmet Şimşek, *Minister of Finance*, Turkey

**09:30-10:00 Group Photo/Coffee Break**

**SESSION I : The G20 Tax Agenda: Shaping The New International Tax Environment**

**Chaired by :** Mr İsa Coşkun, *Undersecretary*, Ministry of Finance, Turkey

**10:00-11:30** In the area of fiscal consolidation, the perception that some corporates do not contribute fairly has become a serious political and social issue. This session sets the stage for the symposium by discussing the features of the current international tax rules that facilitate base erosion and profit shifting (BEPS) and provide an overview of the status of the BEPS Project, including the development of a multilateral instrument to implement the BEPS measures and modify double tax treaties. It will also discuss the progress made in relation to automatic exchange of information and the use of a common reporting standard for banking information. The perspective of developing countries in relation to both BEPS and automatic exchange of information, and the ways in which developing countries are part of, and can benefit from, the reform process will also be presented.

**Panelists :**

- Mr Pascal Saint-Amans, *Director*, OECD CTPA
- Mr Richard Stern, *Lead Tax Officer*, World Bank Group
- Mr Robert Stack, *Deputy Assistant Secretary*, US Department of the Treasury, USA
- Mr Erdal Çalıkoğlu, *Partner/Country Tax Leader*, Ernst&Young
- Mr John Christensen, *Executive Director*, Tax Justice Network

**11:30-12:00 Coffee Break**

**SESSION II** : **Addressing BEPS in The Digital(ised) Economy: Artificial Avoidance of PE Status, Transfer Pricing, CFC Rules, Collection of VAT and Potential Options To Address Broader Tax Challenges**

**Chaired by** : Prof. Dr. Rainer Prokisch, Maastricht University

**12:00-13:30** This session will discuss the BEPS issues raised by the digital economy and how the work in a number of key areas of the BEPS Project (namely Actions, 3, 7, 8-10) will address those BEPS issues. The session will also discuss questions in the area of collection of VAT, as well as potential options to address the broader tax challenges raised by the digital economy concerning nexus, data and characterisation of income. It will do so by taking into account the perspective of both developed and developing countries.

**Panelists :**

- Mr Raffaele Russo, *Head of BEPS Project*, OECD CTPA
- Mr Edouard Marcus, *Deputy Director*, General Directorate for Public Finance, France
- Mr Ahmet Kurt, *Head of Group*, Turkish Revenue Administration, Turkey
- Mr Paul Morton, *Head of Group Tax*, RELX Group PLC
- Mr Pierre Habbard, *Senior Advisor*, Trade Union Advisory OECD

**13.30-14:30** **Lunch**

**Keynote Speaker:** Mr Adnan Ertürk, *Commissioner*, Turkish Revenue Administration, Turkey

**SESSION III** : **Contributing to Financial Stability: The BEPS Work on Interest Deductibility and Hybrid Mismatch Arrangements**

**Chaired by** : Prof. Dr. Hans van den Hurk, Maastricht University

**14:30-16:00** The session will discuss proposals to limit base erosion via interest deductions as well as the new international standards to ensure the coherence of corporate income taxation at the international level through rules that neutralise the effects of hybrid financial instruments and entities. The panel will discuss the relevance and impact of the proposed measures on financial stability. The merits of different approaches will be addressed from developed and developed countries' perspectives.

**Panelists :**

- Mr Achim Pross, *Head of Division*, OECD CTPA
- Mr Brian Ernewein, *General Director*, Government of Canada-Finance, Canada
- Mr Mustafa Cemil Kara, *Head of Department*, Ministry of Finance, Turkey

- Mr William Morris, *Chair*, Taxation & Fiscal Policy Committee, BIAC
- Mr Sol Picciotto, *Emeritus Professor*, BEPS Monitoring Group

**16:00-16:30**      **Coffee Break**

**SESSION IV**      :      **Aligning Tax Rules to the Reality of Global Value Chains: The BEPS Work on Transfer Pricing and its Relevance for Developing Countries**

**Chaired by**      :      Mr İdris Şenyurt, *Head of Department*, Turkish Revenue Administration, Turkey

**16:30-18:00**      The session will discuss the BEPS work in relation to key transfer pricing issues, such as risk allocation, hard-to-value intangibles, and recharacterisation of transactions for transfer pricing purposes. Issues of particular relevance for developing countries, such as the lack of comparables, the pricing of commodity transactions and the treatment of intra-group services will be also be discussed in light of developments in the context of the BEPS Project.

**Panelists :**

- Ms Marlies De Ruitter, *Head of Division*, OECD CTPA
- Ms Sunita Manik, *Group Executive*, South African Revenue Service, South Africa
- Mr James Karanja, *Principal Revenue Officer*, Kenya Revenue Authority, Kenya
- Mr Ramazan Biçer, *Transfer Pricing Senior Manager*, PWC, Turkey
- Mr Ian Brimicombe, *VP Corporate Finance*, Astra Zeneca

**19:30**      **GALA DINNER**      : Addressed by Mr Hüseyin Karakum, *President*, Turkish Tax Inspection Board, Turkey

**Keynote Speaker**      : Mr George Wilfred Talbot, *Permanent Representative of Guyana to the United Nations*, UN, Guyana

Hosted by the Ministry of Finance of Turkey

(Bosphorus Cruise with Dinner)

***Please be ready for Cruise Trip in the Intercontinental Hotel's Lobby at 18:45!***

**Day 3**

**May 8, 2015**

**SESSION V** : **The Economists' perspective on BEPS: Data, Economic Analyses and Spill-Over Effects**

**Chaired by** : Ms Burcu Aydın, *Deputy General Director*, Ministry of Finance, Turkey

**09:00-10:30** The session will discuss possible approaches, data limitations, and issues in quantifying the effects of BEPS behaviours. It will focus on different indicators and analyses available to governments' officials to measure BEPS and the effects of countermeasures that country may put in place. Panellists will also discuss different approaches to data-gathering in different countries, as well as potential spill-over effects across countries of BEPS, looking in particular at the effects on developing countries.

**Panelists :**

- Mr David Bradbury, *Head of Division*, OECD CTPA
- Ms Fabrizia Lapcorella, *Director General*, Ministry of Economy and Finance, Italy
- Mr Michael Keen, *Deputy Director*, IMF Fiscal Affairs Department
- Mr Gaëtan Nicodeme, *Head of the Unit*, Directorate General of Taxation and Customs Union, EU
- Mr Jan Loepnick, *Researcher*, Vienna University of Economics and Business

**10:30-11:00** **Coffee break**

**SESSION VI** : **Implementing the International Consensus on BEPS with Practical and Effective Rules: Domestic Laws, Multilateral Instrument and Toolkits**

**Chaired by** : Mr Tahir Erdem, *Head of Group*, Turkish Revenue Administration, Turkey

**11:00-12:30** The session will discuss the expected outcomes of the BEPS Project and their implementation via domestic and treaty law changes, focusing on the feasibility of a multilateral instrument. The panel will also address the G20-mandated development of toolkits for the application of the BEPS measures by developing countries and the expected outcomes of that work.

**Panelists :**

- Ms Grace Perez-Navarro, *Deputy Director*, OECD CTPA
- Mr Akhilesh Ranjan, *Joint Secretary*, Ministry of Finance, India
- Mr Ivar Nordland, *Deputy Permanent Secretary*, Ministry of Taxation, Denmark
- Mrs Manal Corwin, *Principal and National Leader International Tax*, KPMG –LLP, USA
- Mr Ian Young, *International Tax Manager*, ICAEW

**12:30-13:30 Lunch**

**Keynote Speaker:** Mr Jian Fan, *Chief Economist*, State Administration of Taxation, China

**SESSION VII : From Bank Secrecy to Automatic Exchange of Information: Key Issues Related to Implementation**

**Chaired by :** Prof. Dr. Billur Yaltı, Koc University, Turkey

**13:30-15:00** The session will provide an overview of progress made in the area of exchange of information. It will discuss the impetus for automatic exchange of information as the new global standard, and the current work on a common reporting standard. It will also discuss the role of financial intermediaries and their role in a system that is both effective and efficient.

**Panelists :**

- Mr Achim Pross, *Head of Division*, OECD CTPA
- Mr Martin Kreienbaum, *Director General International Fiscal Affairs*, German Federal Ministry of Finance, Germany
- Mr Valère Moutarlier, *Director*, Directorate General for Taxation and Custom Unions, EU
- Mr Keith Lawson, *Senior Counsel*, Investment Company Institute&ICI Global
- Mr Francis Weyzig, *Senior Policy Advisor*, Oxfam Novib

**15:00-15:30 Coffee Break**

**SESSION VIII : Developing Countries and Automatic Exchange of Information: How to Benefit and Comply with the New Transparency Requirements on Bank Information**

**Chaired by :** Mr Armando Lara Yaffar, *Director General International Tax Affairs*, Ministry of Finance and Public Credit, Mexico

**15:30-17:00** The session will provide an overview of the work of the Global Forum on Transparency and Exchange of Information with a specific focus on developing countries. It will discuss the efforts being made to ensure that developing countries fully benefit from the new cooperative environment and at the same time meet the requirement of the agreed international standards.

**Panelists :**

- Ms Monica Bhatia, *Head of Division*, OECD CTPA



- Ms Maria Jose Garde, *Deputy Director General for International Taxation*, Ministry of Finance and Public Administration, Spain
- Ms Kim Sy Jacinto-Henares, *Commissioner*, Bureau of Internal Revenue, Philippines
- Mr Albert Baker, *Global Tax Policy Leader*, Deloitte LLP
- Mr Joseph Stead, *Senior Economic Justice Adviser*, Christian Aid

**17:00-17:30**

**Closing Address**

- Mr Pascal Saint-Amans, *Director*, OECD CTPA
- Mr İsa Coşkun, *Undersecretary*, Ministry of Finance, Turkey