

Game Plan: Tackling Challenges Presented by an Ever-Changing Global Tax Environment

January 25, 2018
Omni Frisco Hotel
11 Cowboys Way,
Frisco (Dallas), TX



ABOUT THE EVENT

GAME PLAN: TACKLING CHALLENGES PRESENTED BY AN EVER-CHANGING GLOBAL TAX ENVIRONMENT

Multinational corporations continue to face an uncertain environment as legislative changes impact how corporate tax departments handle their tax planning strategies, the audit and appeal process, and compliance. On Thursday, January 25th, we invite you and your colleagues to join Baker McKenzie and the Dallas Chapter of Tax Executives Institute as we meet to discuss US tax reform, the challenges and opportunities it creates, and how it might shape Treasury guidance. This complimentary full-day seminar, ***Game Plan: Tackling Challenges Presented by an Ever-Changing Global Tax Environment***, will take place at the newly opened Omni Frisco Hotel, near Dallas, Texas.

The program agenda includes plenary sessions on the current status of US tax reform, its impact on other countries' tax regimes and actions to consider, including IP migrations, supply chain restructurings and cash repatriation; the progress of BEPS, including the status of permanent establishment and country-by-country reporting; and an update on changes in Mexican tax laws. Breakout sessions throughout the day will enable participants to select among a variety of hot topics including: mergers & acquisitions, indirect taxes and customs, audit trends, unilateral expansions of taxing jurisdictions outside of BEPS, maintaining privilege, changes in state tax policies, significant Canadian tax developments, and changes to the EU tax system. The seminar will conclude with an interactive discussion on tax challenges faced by multinationals as well as planning strategies available to corporate tax departments in light of US tax reform.

We look forward to having you join us. There is no fee to attend. Registration is required and will be accepted on a first come, first-served basis.



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AGENDA

GAME PLAN: TACKLING CHALLENGES PRESENTED BY AN EVER-CHANGING GLOBAL TAX ENVIRONMENT

8:30 am - 9:00 am	Registration and Continental Breakfast
9:00 am - 9:15 am	Welcome and Opening Remarks
9:15 am - 10:00 am	State of Play in US Tax Reform Tax reform is at the top of everyone's agenda. This panel will discuss: (1) the current tax reform package, focusing on the key changes impacting multinational companies, and (2) the expected regulatory guidance from Treasury in light of tax reform.
10:00 am - 11:00 am	Preparing for the End of Nowhere Income, Further Progress of BEPS/OECD Including Permanent Establishment Attacks and Country-by-Country Given the recent changes in tax rules and potential further changing tax landscape, many companies are reconsidering their approaches to tax planning strategies, defenses, and compliance. This interactive panel will engage the audience regarding hot topics and challenges faced by multinational companies today and what they are doing to address the risks and demands of the new and evolving tax environment.
11:30 am - 12:15 pm	Breakout Session I
12:15 pm - 1:45 pm	Lunch
1:45 pm - 2:30 pm	Breakout Session II
3:00 pm - 3:45 pm	Hot Topics in Mexico In this comprehensive session, tax practitioners from Mexico will highlight and discuss the reactions and consequences in Mexico tax policy derived from the US tax reforms and the preliminary tax positions and policies of the candidates for the Mexican presidential election of 2018. Panelists will also provide an update on 2018 changes in Mexican tax laws and other hot topics, such as the status of the implementation of new invoicing and tax reporting requirements.
3:45 pm - 4:55 pm	Challenges Faced by Multinational Enterprises in an Ever Changing Tax Environment MNEs continuously face challenges presented by ever changing tax rules. The panelists will discuss the types of challenges faced by MNEs and planning opportunities still available for MNEs given the current state of US tax reform, including IP migrations, supply chain restructurings, and cash repatriation.
4:55 pm	Closing Remarks
5:00 pm	Cocktail Reception
6:00 pm	Dinner



BREAKOUT SESSIONS

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11:30 AM - 12:15 PM | Breakout Session I

Option A: Trends in Mergers & Acquisitions and Restructurings

This panel will examine current topics that are shaping public and private mergers and acquisitions, including the increasing use and impact of tax insurance. Panelists will also address recent acquisition transaction structures, particularly with respect to private equity purchasers, as well as recent state and local tax developments that impact M&A transactions for multinational companies.

Option B: The World of Indirect Taxes and Customs, and NAFTA Developments

With technology advancing, suppliers of goods and services are able to cover more and more markets from a distance. The perceived distortive effect this may cause on local markets due to outdated VAT and customs rules is being addressed by many countries around the world. The EU often has a leading role here, but changes with respect to indirect taxes are also happening in Asia. In addition, with NAFTA negotiations in-process, and the EU's Brexit getting closer, companies should be aware what VAT and customs implications may arise from this, not only in respect of additional border formalities but also effects on core customs consequences such as origin or valuation of products for import purposes. Panelists will address important legal and political developments in the fields of VAT and customs.

Option C: Beyond BEPS: Unilateral Expansions of Taxing Jurisdiction Around the World

Various countries have gone beyond BEPS to issue their own unilateral actions, often flouting treaty provisions. Taxpayers are forced to determine their long-term impacts and respond. Implementation of these initiatives have far-reaching impacts in terms of substance, how taxpayers look at effective tax rates and strategies to manage the risks. This session will highlight the most significant developments outside of BEPS, including in Australia, India, Brazil, and the United Kingdom. Layering on top of this and directed at the same income would be any potential US tax reform ending deferral.

Option D: Protecting Your Information in an Increasingly Global Environment

In an increasingly global environment, maintaining privileges and protections over your information is becoming more and more challenging. This panel will discuss various hypothetical situations in which in-house tax practitioners often find themselves in the context and privileges and protections, as well as best practices for maintaining these privileges and protections.

1:45 PM - 2:30 PM | Breakout Session II

Option A: Hot Topics in Europe: Transparency, State Aid, and Common Consolidated Corporate Tax Base

This session will focus on the significant changes that the EU tax system is undergoing, including the developments in relation to State Aid and the way this is affecting the ruling practice in Europe. Also, updates will be provided in connection with EU transparency initiatives and the status of the re-launching of the Common Consolidated Corporate Tax Base. Finally, an update on Brexit will be provided.

Option B: Tax Audit Trends at Home and Abroad

Political pressure on tax authorities remains high globally and taxpayers increasingly face contentious tax controversies around the world, with tax authorities becoming increasingly more aggressive. Tax disputes are also frequently taking longer to resolve due to tax authority resource constraints and changes to the administrative process. This panel will highlight key enforcement trends, along with best practices to successfully manage tax controversies around the world.

Option C: Hot Topics in Canada

The most significant Canadian tax developments of 2017 will be examined, including changes impacting distributions, the signing of multilateral instruments, and updates to loan rules. Anticipated developments for 2018 also will be examined.

Option D: Managing a Runaway Tax Base - Positioning for Success in the New SALT World

As US states continue to face revenue shortfalls and perceived erosions of the tax base, new and old approaches to raising revenue are being creatively employed to capture income that is arguably outside their borders. This session will discuss the most common ways in which states have sought to increase the tax base, including aggressive nexus positions, scrutiny of intercompany financing arrangements, "worldwide" combination and tax havens, and transfer pricing adjustments, and how to manage these risks. In addition, we will discuss how federal tax reform could impact the SALT base.



REGISTRATION

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Attendee Name: _____

Address: _____

Title: _____

Phone Number: _____

Company: _____

Email: _____

Registration and additional Information:

To register for the seminar, complete and return this form by email to taxnews@bakermckenzie.com or follow the [link here](#) to register online. For additional program information or to cancel your registration please send a note to the same email address provided above. There is no fee to attend, but registration is required and will be accepted on a first come, first served basis. This seminar is not open to other professional service providers.

- TEI Member
- I would like to receive information regarding membership benefits from Tax Executives Institute

Breakout Selections:

To help us plan our seminar, please designate which breakout sessions you wish to attend

11:30 am - 12:15 pm Breakout Session I

- A: Trends in Mergers & Acquisitions and Restructurings
- B: The World of Indirect Taxes and Customs, and NAFTA Developments
- C: Beyond BEPS: Unilateral Expansions of Taxing Jurisdiction Around the World
- D: Protecting Your Information in an Increasingly Global Environment

1:45 pm - 2:30 pm Breakout Session II

- A: Hot Topics in Europe: Transparency, State Aid, and Common Consolidated Corporate Tax Base
- B: Tax Audit Trends at Home and Abroad
- C: Hot Topics in Canada
- D: Managing a Runaway Tax Base - Positioning for Success in the New SALT World

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