

**Baker
McKenzie.**

Middle East & North Africa (MENA) Tax Forum 2023

**The Changing Tax Landscape and the Impact
of the Global Minimum Tax in the Region**

Wednesday, 18 October 2023 | JW Marriott Marquis Hotel Dubai



Contents

Middle East and North Africa Tax Forum Agenda 3

Meet our Speakers

Baker McKenzie Team 5

Baker McKenzie Global Tax Team 7

External Speakers 7

Event Information 8



Agenda

9:00 am – 9:30 am	Registration & Welcome Coffee
9:30 am – 9:40 am	Opening Remarks Reggie Mezu (Senior Counsel, Baker McKenzie)
9:40 am – 10:30 am	Regional Update Our panel of experts across the MENA region will provide important perspectives on various developments that are shaping the tax world in the region. In this session, we will focus on the UAE, Kingdom of Saudi Arabia (KSA) and Egypt, where businesses typically spend significant time in managing their tax affairs, and global tax developments that are relevant to the region. Moderator: Maha Abualfaraj (Senior Associate, Legal Advisors) Panel: Mounia Benabdallah (Partner, Baker McKenzie), Trusha Makan (Senior Associate, Baker McKenzie) and Hazem Shawki (Managing Partner, IAS)
10:30 am – 11:00 am	Morning Coffee Break
11:00 am – 11:45 pm	Pillar 2: the Global Minimum Tax is dominating the international tax world, but what are the building blocks, where do we stand today and what can we expect? This session will serve as a refresher on the basics of Pillar 2 as well as an overview of current implementation all over the globe. We will also share perspectives on how Pillar 2 could directly and indirectly impact the MENA region. Moderator: Mounia Benabdallah (Partner, Baker McKenzie) Panel: Reza Nader (Partner, Baker McKenzie), Ben Phillips (Senior Associate, Baker McKenzie)
11:45 pm – 1:00 pm	Lunch & Networking
1:00 pm – 1:45 pm	Litigation in MENA As we reflect on the revolution of tax in the region, navigating the tax dispute landscape has never been more complex. In this environment, the efficient and effective resolution of tax disputes has become increasingly important. Tax controversy management continues to be a topical agenda for many organizations. Significant disputes are continuing to arise in many areas of tax, including VAT, Permanent Establishments, WHT, in many of the MENA jurisdictions, and new issues such as the disputes on Real Estate Transaction Tax before the appeal panels in KSA. In this session, we will discuss the litigation issues that are starting to surface in the region, including: <ul style="list-style-type: none"> ▪ Processes, legislation and important precedents; and ▪ Mitigation strategies which are vital to ensure the best possible outcomes for you to manage your tax position. Moderator: Tina Hsieh (Partner, Baker McKenzie) Panel: Maha Abualfaraj (Senior Associate, Legal Advisors), Mohamed ElBaghdady (Head of Tax, Habib Al Mulla & Partners) and Noor El-Gohary (Associate, Helmy, Hamza & Partners)

Agenda (continued)

1:45 pm – 2:30 pm

UAE Corporate Tax (CT)

With many businesses starting to apply UAE Corporate Tax (CT) with effect from 1 January 2024, we will address the latest legislative developments focusing on a number of areas including:

- the applicability of CT to UAE free zone entities
- the determination of taxable income and conditions to exempt income streams;
- key restructuring relief provisions; and
- tax compliance obligations and information to be disclosed to the UAE tax authority.

Speaker: Ben Phillips (Senior Associate, Baker McKenzie)

2:30 pm – 3:00 pm

Afternoon Coffee Break

3:00 pm – 3:45 pm

Transfer Pricing (TP) updates

This session will provide a forward-looking perspective on the “go-live” phase of transfer pricing in the UAE and look back at the lessons learned leading up to the implementation. The session will also address how the latest developments in global tax policy could affect transfer pricing policies in the region, such as developments regarding Amount B at the level of the OECD (as part of Pillar 1, though with broader reach).

Speaker: Folkert Mulder (Legal Director, Baker McKenzie)

3:45 pm – 4:30 pm

Pillar 2: the practical side

After having discussed the key aspects in our earlier session, this session will look to address how in-scope multinationals can best prepare for the introduction of Pillar 2, including what modelling could look like as well how companies can prepare their group structure for the introduction of the rules in 2024 and beyond.

Moderator: Mounia Benabdallah (Partner, Baker McKenzie)

Panel: Reza Nader (Partner, Baker McKenzie), Ben Phillips (Senior Associate, Baker McKenzie)

4:30 pm – 4:40 pm

Closing Remarks

Speakers: Reggie Mezu (Senior Counsel, Baker McKenzie) and Marnin Michaels (Partner, Baker McKenzie)

4:40 pm – 5:30 pm

Cocktails and Networking

Meet our speakers

Baker McKenzie MENA Tax Team



Reggie Mezu
Senior Counsel, UAE
reggie.mezu@
bakermckenzie.com

Reggie Mezu is a senior special counsel in Baker McKenzie's Dubai office. He specialises in corporate tax and has practiced tax for nearly 30 years, including in the UAE for 15 years. A chartered accountant, chartered tax adviser and a solicitor admitted in the UK, he has lived and worked in the UK, Nigeria, Singapore, the Netherlands and the UAE.

Reggie advises on corporate direct and indirect tax matters, with particular focus on cross-border and transactional work across the Middle East and Africa. He is recognised as a leading tax adviser by Euromoney's World Tax and a world leading tax adviser in Euromoney's Expert Guides.



Tina Hsieh
Partner, UAE
tina.hsieh@
bakermckenzie.com

Tina Hsieh is a partner in Baker McKenzie's Dubai office. She advises leading corporations and public entities on VAT and transaction taxes. Tina works across all sectors, however she has deep experience in advising on indirect taxes relating to financial services, property and construction, energy and government sectors.

As an established indirect tax specialist and a trained lawyer in Australia together with her GST / VAT implementation experience in Malaysia, China, United Arab of Emirates (UAE), Kingdom of Saudi Arabia (KSA), Kingdom of Bahrain ("Bahrain") and Sultanate of Oman (Oman), she leverages these experiences to provide advisory support and assist clients in the VAT implementation projects in the remaining Gulf Cooperation Council (GCC) countries.



Trusha Makan
Senior Associate, UAE
trusha.makan@
bakermckenzie.com

Trusha Makan is a senior associate in Baker McKenzie's Dubai office. An emerging markets focused VAT executive, she has 11 years of experience in advisory, including a decade across Southern Africa and the Middle East.

Trusha has extensive experience in advising private and public sector clients with a global presence, on indirect tax aspects of mergers and acquisitions, corporate restructuring activities, business acquisitions, inbound and outbound investment and infrastructure transactions.



Ben Phillips
Senior Associate, UAE
ben.phillips@
bakermckenzie.com

Ben Phillips is a senior associate in Baker McKenzie's Dubai office, advising on international tax, mergers and acquisition matters and domestic corporate tax legislation across the MENA region. Ben has over 11 years' experience in the UAE and UK and has advised on matters across the UAE, GCC and globally across this period.

More recently, Ben has had a specific focus on the introduction of corporate tax in the UAE as well as the Pillar One and Pillar Two initiatives announced by the OECD.

Meet our speakers

Baker McKenzie MENA Tax Team (continued)



Folkert Mulder
Legal Director
Netherlands/UAE
folkert.mulder@
bakermckenzie.com

Folkert Mulder is a transfer pricing director, working primarily with the Amsterdam and United Arab Emirates tax teams. Folkert is currently the transfer pricing lead for the Middle East and North Africa. Folkert's practice covers the full range of transfer pricing aspects, with a focus on IP strategies, transfer pricing design, business and intangible asset valuation, financial modelling and dispute resolution, including litigation.

Folkert has also worked with other Baker McKenzie teams on quantitative modelling for general tax planning purposes (including Pillar 1 and Pillar 2), patent box work as well as general economics (including competition).



Maha Abualfaraj
Senior Associate
Saudi Arabia
maha.abualfaraj@
legal-advisors.com

Maha Abualfaraj is an experienced attorney in the Firm's Riyadh office. She focuses on corporate taxation of cross-border taxation and has extensive experience practicing in Saudi Arabia and the Gulf Cooperation Council (GCC). With over 10 years of experience, Maha has advised on tax matters across various sectors. She also has experience in developing tax policy and tax legislation in Saudi Arabia.

She also served as Director of Tax Policy and Legislation at the Saudi Arabian Zakat, Tax and Customs Authority where she advised on various tax policy matters including tax incentives in special economic zones in the Kingdom.



Noor El-Gohary
Associate, Egypt
noor.el-gohary@
bakermckenzie.com

Noor El-Gohary is an associate at Baker McKenzie's Dispute Resolution practice group based in Cairo. She has represented and advised a multitude of leading multinational companies, with a specific focus on civil, tax and commercial litigation, white collar defense and investigations, compliance and other complex commercial disputes with particular interest in telecom and tech.

Noor is highly skilled in dispute project management, targeted discovery focused at securing key evidence required to resolve the most complex cases, efficient settlement and communication with key stakeholders.

Meet our speakers

Baker McKenzie Global Tax Team



Mounia Benabdallah
Partner, New York
mounia.benabdallah@
bakermckenzie.com

Mounia Benabdallah is a partner in Baker McKenzie's International Tax Practice Group and has practiced in Baker McKenzie's Amsterdam, Chicago and New York offices over the past 18 years. Currently based in New York, she advises large (US) multinationals with their international tax matters. She has a strong focus on global tax policy and its impact on tax structuring for the future.

Mounia is repeatedly recognized as leading advisor in ITR's Women in Tax Leaders guide.



Reza Nader
Partner, New York
reza.nader@
bakermckenzie.com

Reza Nader is a partner based in the New York office of Baker McKenzie and advises multinational companies on US tax matters. He currently serves as co-chair of Baker McKenzie's North America Tax Planning and Transactions Practice.

Reza advises clients on US federal income taxation with a focus on international tax planning and mergers and acquisitions, including on tax structuring for global transactions, often as part of dispositions, acquisitions or legal entity rationalization projects. Reza has also been focused on helping companies navigate the impact of US and international tax reform and has advised on complex issues involving the foreign tax credits, BEAT, GILTI, FDII, Corporate AMT, excise tax on stock buybacks and Pillar 1 and Pillar 2.



Marnin Michaels
Partner, Switzerland
marnin.michaels@
bakermckenzie.com

Marnin Michaels is a senior partner at the Baker McKenzie Office in Zurich. Marnin has been practicing more than 20 years in the areas of tax and international private banking. Marnin focuses on all matters relevant to the wealth management industry and its clients. He handles insurance matters relating to tax investigations and wealth management, as well as counsels clients on issues relating to US withholding tax, qualified intermediary rule and FATCA.

He also advises on issues related to potential tax evasion and cross-border regulatory issues, as well as money laundering avoidance legislation.

External Speakers



Mohamed ElBaghdady
Habib Al Mulla & Partners
Head of Tax, UAE
mohamed.elbaghdady@
habibalmulla.com

Mohamed ElBaghdady is a senior lawyer in the Dispute Resolution Practice Group of Habib Al Mulla and Partners. He is based in Dubai. He has dispute resolution experience across a number of specialized areas including civil, commercial, tax and criminal law as well as energy and infrastructure, corporate, real estate, construction and employment disputes.

Mohamed focuses on dispute resolution primarily on tax matters, general corporate international business transactions and white collar crime, as well as on international and local arbitration.



Hazem Shawki
IAS
Managing Partner
hazem.shawki@
ias-corp.org

Hazem Shawki has over 24 years of experience with multinational professional firms in Egypt. He has experience working with a wide variety of taxation issues, office and branch formations, social insurance, payroll outsourcing and customs assignments in various industries including banking, trading, manufacturing, construction, pharmaceutical, automotive and oil & gas industries in Egypt.

Hazem has previously worked at Andersen Tax & Legal, EY and Arthur Andersen.

Event Information

MENA Tax Forum

We look forward to seeing you at the JW Marriott Marquis Hotel, Sheikh Zayed Road, Business Bay, Dubai, on Wednesday, 18 October 2023. Upon arrival at the hotel, please take the podium elevator on the right-hand side of the lobby upon entering. The Baker McKenzie MENA Tax Forum will take place in meeting rooms Al Safa 1 & 2 located on the 4th floor of the hotel.

Private client meetings

Our Baker McKenzie tax team will also be available for private one-on-one meetings on Tuesday, 17 October 2023, to discuss specific tax developments and issues that might be of particular relevance to your business.

Please email uae.bd@bakermckenzie.com to set up an appointment.

For any questions relating to the conference, please contact:



Mick Olano
BD & Marketing Manager, UAE
+ 971 4 542 1922
michael.olano@bakermckenzie.com



Jenny Medina
BD Executive, UAE
+ 971 4 542 1923
jenny.medina@bakermckenzie.com

Baker McKenzie delivers integrated solutions to complex challenges.

Complex business challenges require an integrated response across different markets, sectors and areas of law. Baker McKenzie's client solutions provide seamless advice, underpinned by deep practice and sector expertise, as well as first-rate local market knowledge. Across more than 70 offices globally, Baker McKenzie works alongside our clients to deliver solutions for a connected world.

bakermckenzie.com