

# INTERNATIONAL TAX REVIEW™

*presents the 8th annual*

## GLOBAL TRANSFER PRICING FORUM 2008



SEPTEMBER 16TH & 17TH  
ROME CAVALIERI,  
THE WALDORF=ASTORIA COLLECTION,  
ROME

in association with

**BAKER & MCKENZIE**

*International*

**GLOBAL TRANSFER P**  
September 16th & 17th, Rome Caval

DAY ONE: TUESDAY, SEPTEMBER 16TH

- 8:30AM Registration  
9:00AM Opening remarks  
**Ralph Cunningham**, *International Tax Review*, UK  
**John Peterson**, Partner, Baker & McKenzie, US  
**Host:** Marc M. Levey, Partner, **Baker & McKenzie**, US
- 9:05AM Keynote address  
Andrea Bonzano, Fiat, Italy
- 9:20AM **THE FUTURE OF GLOBAL TRANSFER PRICING**  
*Trends in Compliance, Disclosure and Financial Reporting (FIN 48)*
- *Emerging issues and developments*
  - *Risk management and audit trends*
  - *APA evolution – risk management tool or surrender*
  - *Trends in financial statement disclosures and reporting (FIN 48)*
  - *Customs, VAT and transfer pricing integration*
  - *Arm's length standard or formulary apportionment?*
  - *Common consolidated tax base considerations*
- Moderator:** **John Peterson**, Partner, Baker & McKenzie, US  
**Chris Brodersen**, Baker & McKenzie, Germany  
**Andrea Bonzano**, Fiat, Italy  
**Jorge Narvaez-Hasfura**, Baker & McKenzie, Mexico
- 10:45AM Coffee break
- 11:15AM **ITALIAN TRANSFER PRICING DEVELOPMENTS**
- *Marketing intangibles in Italy*
  - *Documentation for Italian companies*
  - *Transfer of functions and business restructuring*
  - *Economic analysis and trends*
  - *Permanent establishment as default for transfer pricing*
  - *Trends for audits and APAs*
- Moderator:** **Carlo Gnetti**, Baker & McKenzie, Italy  
**Gianni de Robertis**, KStudio Associate (KPMG), Italy  
**Paolo Valerio Barbantini**, Italian Revenue Service TP division, Italy  
**Carmine Rotondaro**, Gucci Group, Italy  
**Agostino Nuzzolo**, Italcementi SpA, Italy
- 12:30PM Lunch
- 2:00PM **THE FUTURE OF ARBITRATION IN TRANSFER PRICING**
- Arbitration under the European arbitration convention
  - Arbitration under the OECD model treaty
  - Arbitration under existing treaties
  - Procedures and practice
- Moderator:** **Monique van Herksen**, Baker & McKenzie, The Netherlands  
**David Fraser**, Baker & McKenzie, UK  
**Edward Morris**, HMRC, UK
- 3:15PM Coffee Break
- 3:45PM **SERVICES TRANSACTIONS: UPDATE, TRENDS, GLOBAL REACTION**
- *Reaction to US service regs*
  - *Headquarter services*
  - *Chargeout of management fee considerations*
  - *VAT consequences*
  - *EUJTPS positions*
- Moderator:** **Richard Fletcher**, Baker & McKenzie, UK  
**Guglielmo Maisto**, Maisto Avvocati, Italy  
**Dale Hill**, Gowling Lafleur Henderson, Canada  
**Robert Kirschenbaum**, Baker & McKenzie, US  
**Ricardo Gonzales Orta**, Deloitte, Mexico
- 5:30PM Cocktail reception



## *I Tax Review*

# RICING FORUM 2008

ieri, The Waldorf=Astoria Collection

### DAY TWO: WEDNESDAY, SEPTEMBER 17TH

9:00AM	<b>Introduction</b> Gerardo Boniello, Baker & McKenzie, Italy
9:05AM	<b>Keynote address</b> Caroline Silberstein, OECD, France
9:20AM	<b>MANAGING MULTICOUNTRY TAX AUDITS</b> <ul style="list-style-type: none"><li>• <i>Maintaining consistency in facts, documents and strategy</i></li><li>• <i>Multicountry coordination</i></li><li>• <i>Attention to local practices</i></li><li>• <i>Dispute resolution</i></li><li>• <i>Exchange of information concerns</i></li></ul> <b>Moderator: Marc M. Levey</b> , Baker & McKenzie, US <b>Doug McCormack</b> , Bristol Myers Squibb, US <b>Francois Gadel</b> , LVMH, France <b>Brant Miller</b> , International Game Technology, US <b>Werner Stuffer</b> , Siemens, Germany <b>Stefaan de Baets</b> , Belgium Tax Authority, Belgium <b>Giuliana Polacco</b> , Baker & McKenzie, Italy
10:45AM	Coffee break
11:15AM	<b>ECONOMIC ISSUES SURROUNDING MARKETING INTANGIBLES</b> <ul style="list-style-type: none"><li>• <i>Valuation approaches for marketing intangibles</i></li><li>• <i>What type of spending creates marketing intangibles?</i></li><li>• <i>Measuring the life of a marketing intangible</i></li><li>• <i>Specified and unspecified methods: strengths and weaknesses</i></li><li>• <i>Valuation methods preferred by taxing authorities</i></li><li>• <i>Cost sharing</i></li></ul> <b>Moderator: Richard Boykin</b> , Baker & McKenzie, UK <b>Isabel Verlinden</b> , Pricewaterhouse Coopers, the Netherlands <b>Jesper Wang-Holm</b> , Danish Tax and Customs Administration, Denmark
12:30PM	Lunch
2:00PM	<b>Keynote address</b> : Bruno Gilbert, Chair of European Union Joint Transfer Pricing Forum <b>BUSINESS RESTRUCTURINGS – A MOVING TARGET</b> <ul style="list-style-type: none"><li>• <i>Update on OECD project</i></li><li>• <i>Application of the arm's length principle in different global regions</i></li><li>• <i>Implication for financial institutions</i></li><li>• <i>Audit and planning issues</i></li><li>• <i>Practical examples of transferable functions and risks with significant substance</i></li></ul> <b>Moderator: Pierre Yves Bourtourault</b> , Baker & McKenzie, France <b>Stephan Schnorberger</b> , Baker & McKenzie, Germany <b>Caroline Silberstein</b> , OECD, Europe
3:15PM	Coffee Break
3:45PM	<b>TRANSFER PRICING ISSUES IN ASIAN AND EASTERN EUROPE COUNTRIES</b> <ul style="list-style-type: none"><li>• <i>Trends in transfer pricing approaches, methods, and consideration of intangibles</i></li><li>• <i>Customs and transfer pricing coordination</i></li><li>• <i>Recent experiences in tax controversies and with dispute resolution</i></li><li>• <i>Impact of China tax reform</i></li><li>• <i>Documentation requirements – how much is enough?</i></li></ul> <b>Moderator: Glenn DeSouza</b> , Baker & McKenzie, China <b>Ken Okawara</b> , Baker & McKenzie, Japan <b>Michael Rohacek</b> , Ministry of Finance, Czech Republic <b>Mukesh Butani</b> , BMY Associates, India

**Further speakers still to be confirmed**  
**For more information and programme updates please visit:**  
**[www.internationaltaxreview.com/gtpf08](http://www.internationaltaxreview.com/gtpf08)**

**International Tax Review, in association with Baker & McKenzie**, is delighted to host the eighth **Global Transfer Pricing Forum** on September 16th & 17th 2008 at the Rome Cavalieri, The Waldorf-Astoria Collection in Rome.

This annual event builds on previous successful editions in Berlin (twice), London, Barcelona, New York, Paris and Amsterdam.

What you will get from being in Rome:

- Discussion by leading transfer-pricing personalities from all over the world will of issues such as how to handle controversies; intangibles; economic issues and migrations and transfer of functions and risks
- Opinions from OECD, EU and national revenues officials on their transfer pricing priorities
- Guidance from local specialists on transfer pricing in emerging markets, specifically in Asia and Eastern Europe
- Insights on the economic issues surrounding market intangibles
- Senior specialists will moderate all panels, ensuring they are as interactive and useful for our audience as possible.

One of the key benefits of **International Tax Review's Global Transfer Pricing Forum** is the strong focus on the practical issues for international companies when faced with the compliance challenge of coordinating their global transfer pricing documentation. Apart from the top-notch speaker line-up, this event distinguishes itself by the focus on transfer pricing rules alongside the commercial realities affecting the companies tax executives work for.

Attendees will hear tax directors from some of the largest multinationals in the world share their transfer pricing experiences and offer insights as to how to best avoid some of the risks and take advantage of some of the opportunities that transfer pricing presents.

Networking opportunities include four half-hour coffee breaks, lunch on both days and a cocktail reception at the end of day one.

It is the pre-eminent transfer pricing event in world giving access to the top tax executives at multinationals, their tax advisers as well as leading public officials.

I would like to register for *International Tax Review's*  
**GLOBAL TRANSFER PRICING FORUM 2008**  
September 16th & 17th, Rome Cavalieri, The Waldorf=Astoria Collection

**1. I WISH TO REGISTER:**

**Registrations**

- Private practice delegates – £1,295 or €1,647 or US\$2,559  
 In-house tax executives – £1,095 or €1,393 or US\$2,164

**Early bird registrations (by July 25th)**

- Private practice delegates – £1,195 or €1,520 or US\$2,362  
 In-house tax executives – £995 or €1,265 or US\$1,966

£/€//\$  Total remittance

**2. CONTACT DETAILS:**

Name:  Zip/Postcode:

Position:  Country:

Company:  Tel:

Address:  Fax:

Email:

Please photocopy this form for additional delegates.

I cannot attend but please add me to your mailing list.

**3. PAYMENT METHODS:**

Payment must be received before the conference date to guarantee your place.

Bank transfer quoting invoice number

**£ Account** – 1043191; Sort code – 30-00-02

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Lloyds Bank TSB Plc, City Office, PO Box 72

Bailey Drive, Gillingham Business Park

Gillingham – Kent, ME8 0LS, UK

**\$ Account** – 11512129; Sort code – 30-12-18

IBAN no – GB 29 LOYD 301218 11512129

**€ Account** – 59008833; Sort code – 30-12-18

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**4. FIVE EASY WAYS TO REGISTER:**

**Fax:**

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**Mail:**

Complete and return to  
Catherine Hall  
Legal Media Group

**Telephone:**

UK: +44 (0) 20 7779 8999

**Email:** [registrations@legalmediagroup.com](mailto:registrations@legalmediagroup.com)

Nestor House, Playhouse Yard,  
London, EC4V 5EX, UK

**Online:**

at [www.internationaltaxreview.com/gtppf08](http://www.internationaltaxreview.com/gtppf08)

**ADMINISTRATIVE INFORMATION:**

**CANCELLATION POLICY:** If you cannot attend you must cancel your registration in writing by 16th August 2008 to receive a refund less a 10% administration charge. Cancellations received after 16th August 2008 are liable for the full conference fee. You may send a substitute to attend in your place at no extra charge, however we must know by 15th September 2008 via email. We cannot accept verbal cancellations. If you make your booking via the telephone, you are automatically adhering to our terms and conditions.

**REGISTRATION FEE:** The registration fee includes participation in the conference, lunches, cocktail reception and documentation material, which will be distributed at the beginning of the event.

**VENUE:** Rome Cavalieri, The Waldorf=Astoria Collection,  
Via Alberto Cadlolo, 101

Rome 00136

Italy

Tel: +39 06 35091

Email: [reservations.rome@hilton.com](mailto:reservations.rome@hilton.com)

Web: <http://www.hilton.co.uk/cavalieri>

**TRAVEL & ACCOMMODATION:** Delegates are responsible for the arrangement and payment of their own travel and accommodation. Delegates wishing to take advantage of preferential room rates at the Rome Cavalieri should call the above numbers and mention that you are attending the International Tax Review Asia Global Transfer Pricing Forum 2008.