

## Global Tax Disputes Forum

### The Shape of Water: Tax Disputes in the Age of Intangible Value

7 February 2019 | Milan

#### Agenda

Time	Session/Workshop		
09:00 – 09:30	Registration and Coffee		
09:30 – 09:35	Opening Remarks		
09:35 – 10:35	<b>Plenary Session – The Shape of Water: Tax Disputes in the Age of Intangible Value</b> <i>The Shape of Water</i> , new <a href="#">research that Baker McKenzie has recently conducted</a> , shows that the amount of tax globally in dispute is so large that it wipes out more than half of the profit growth of the Fortune 500. With tax disputes predicted to continue rising in the coming years, how can corporate taxpayers best prepare to effectively manage the load? In this session, we will discuss the main findings of our research and explore what these findings mean for the future of tax litigation and the positions taken by the OECD and global tax authorities.		
10:35 – 11:00	Coffee Break		
11:00 – 12:00	<b>Stream I: Intersection of Tax and Other Functions Inside the Organization</b> <b>Workshop 1 – Criminalization of Tax Offenses</b> With the increased criminalization of tax audits and liabilities for directors, tax decisions now influence management’s behaviour. In this workshop, we will discuss possible approaches to tax issues and explain how they may conflict with management’s interests. We also will identify potential solutions to these conflicts.	<b>Stream II: Tax Audits and Litigation</b> <b>Workshop 2 – Tax Investigations</b> Tax audits are becoming more and more sophisticated and investigation powers are more extensive. Tax auditors are using technology and intelligence to acquire information from and about taxpayers. In this workshop, we will identify the best strategies to manage audits in this increasingly sophisticated environment.	<b>Stream III: On the Spot!</b> <b>Workshop 3 – Transfer Pricing Disputes</b> Intercompany relationships are increasingly being put under scrutiny. Tax authorities are interested in understanding where the value is created and adopting alternative approaches. Financial transactions are objects of attention. Our transfer pricing experts will provide insights regarding how to best handle transfer pricing audits and litigation.

12:00 – 13:00	<p><b>Stream I: Workshop 1 – How to Manage the Tax Risk</b></p> <p>The increasing role of tax within business organizations requires companies to identify and implement tools to manage risks. At a minimum, companies should implement internal processes to manage and exchange information between the different functions within the organization. Companies also should consider engaging in dialogues with the relevant tax authorities in an attempt to prevent or minimize future tax disputes.</p>		<p><b>Stream II &amp; III: Workshop 2 – Multilateral Tax Audits and Exchange of Information</b></p> <p>We now live in a world of cooperation and information sharing. Tax authorities are increasingly cooperating with each other to audit multinational groups and exchange information. In this workshop, we will address the legislation supporting the exchange of information between tax authorities and practical experiences regarding joint or multilateral tax audits.</p>
13:00 – 14:00	<p><b>Lunch</b></p>		
14:00 – 15:00	<p><b>Workshop 1 – Privacy, Confidentiality and Privilege During Tax Disputes</b></p> <p>In the context of a tax dispute, tax authorities are collecting a range of information from taxpayers. Tax assessments, settlements and APAs could be shared with other tax authorities. In this workshop, we will identify the taxpayers' rights, as well as the powers of the tax authorities to implement effective measures to prevent breaches of the rights and spill-over effects.</p>	<p><b>Workshop 2 – How to Respond and Manage Disputes</b></p> <p>It is not easy to identify the correct strategy to respond to tax authorities following an audit. Creating an atmosphere of cooperation and transparency is often critical to build trust, without forgetting the merit of the case. In this workshop, we will address practical situations and provide comments on how to address requests from tax authorities in order to comprehensively defend the taxpayer's position.</p>	<p><b>Workshop 3 – Impact of the US Reform on Global Tax Disputes</b></p> <p>The recent changes in US tax law combined with the current global tax environment may create a ripe environment for increased tax controversies. This session will highlight the recent changes and provide strategies to help prepare for the coming wave of tax disputes involving international issues.</p>
15:00 – 15:30	<p><b>Roundtable Discussions – Tax Audit Trends</b></p> <p>While the world continues to shrink, different tax authorities still maintain different audit approaches. This interactive session will allow participants to meet in small groups with our practitioners from various countries to discuss audit trends and approaches in their jurisdictions.</p>		
15:30 – 16:00	<p><b>Coffee Break</b></p>		
16:00 – 17:00	<p><b>Plenary Session – Views from Inside the Tax Department</b></p> <p>With tax disputes predicted to continue rising in the coming years, how are legal and in-house teams coping with the situation? In this session, in-house tax professionals will share their views and experiences and will engage in a lively discussion with our tax experts.</p>		
17:00	<p><b>Drinks and Canapés</b></p>		