

PROGRAMME

PUBLIC CONSULTATION ON TRANSFER PRICING MATTERS

19-20 MARCH 2015

**OECD CONFERENCE CENTRE
2 RUE ANDRÉ PASCAL 75016 PARIS, FRANCE**

THURSDAY 19 MARCH 2015	
08:30 - 09:30	REGISTRATION
09:30 - 09:45	OPENING REMARKS AND GROUND RULES
	<p><i>Speakers:</i></p> <p>Michelle Levac, <i>Chair of Working Party No. 6</i></p> <p>William Morris, <i>BIAC</i></p>
09:45 - 11:00	I. DISCUSSION DRAFT ON REVISIONS TO CHAPTER I OF THE TRANSFER PRICING GUIDELINES – SECTION D1
	<p><i>Status of OECD Consideration - Mike McDonald, Co-Chair of Working Party No. 6</i></p> <p><i>Speakers:</i></p> <p>Mervyn Skeet, <i>BIAC</i>; Jörg Schindler, <i>BDI</i></p> <p>1. <i>Concept of delineating the actual transactions as first step in the comparability analysis</i></p> <p>Inga Kondrataite, <i>TEI</i>; Gary Sprague, <i>Treaty Policy Working Group</i></p> <p>2. <i>Role of contracts</i></p> <p><i>Open Discussion</i></p>
11:00 - 11:30	Refreshment Break
11:30 - 13:15	II. DISCUSSION DRAFT ON REVISIONS TO CHAPTER I OF THE TRANSFER PRICING GUIDELINES – SECTION D2
	<p><i>Status of OECD Consideration - Blair Vokey</i></p> <p><i>Speakers:</i></p> <p>Patrick Breslin, <i>NERA</i>; Philippe Penelle, <i>Deloitte</i></p> <p>1. <i>Identification and importance of risk</i></p> <p>Ian Brimicombe, <i>AZ</i>; Stephen Hayes, <i>Transocean</i></p> <p>2. <i>Reward to capital and reward to capability</i></p> <p>Clark Chandler, <i>KPMG</i>; Mark Bronson, <i>Duff & Phelps</i></p> <p>3. <i>Allocation of risk and moral hazard</i></p> <p><i>Open Discussion</i></p>
13:15 - 14:30	Lunch break

14:30 - 16:00	III. DISCUSSION DRAFT ON REVISIONS TO CHAPTER I OF THE TRANSFER PRICING GUIDELINES – SECTIONS D2 AND D4
	<p><i>Status of OECD Consideration - Stig B. Sollund</i></p> <p>Speakers:</p> <p><i>Sam Maruca, Covington; Paul Daly, BDO</i></p> <p>1. <i>Risk-return trade-off</i></p> <p><i>Jesper Barenfeld, Confederation of Swedish Enterprise; Martin Zetter, Macfarlanes</i></p> <p>2. <i>Criterion in paragraph 89 and example in paragraph 90</i></p> <p><i>Colin Garwood, IHG; Rob Johnson, SVTDG</i></p> <p>3. <i>Distinction between delineating the actual transaction and non-recognition, and need for non-recognition</i></p> <p><i>Stephen Pautard, ABI; Damon Lambert, Insurance Company Working Group</i></p> <p>4. <i>Relevance to financial services sector</i></p> <p>Open Discussion</p>
16:00 - 16:30	Refreshment Break
16:30 - 18:00	IV. DISCUSSION DRAFT ON REVISIONS TO CHAPTER I OF THE TRANSFER PRICING GUIDELINES – POTENTIAL SPECIAL MEASURES
	<p><i>Status of OECD Consideration - Maura Parsons</i></p> <p>Speakers:</p> <p><i>Caroline Silberztein, IAPT; Sol Picciotto, BEPS Monitoring group; Warren Novis, Irish Tax Institute; Ronald van den Brekel, EY; Catherine Schultz, NFTC</i></p> <p>1. <i>The concept of special measures and the advantages and disadvantages of the options</i></p> <p>Open Discussion</p>

FRIDAY 20 MARCH 2015

9:30 - 11:00	V. DISCUSSION DRAFT ON THE USE OF PROFIT SPLITS IN THE CONTEXT OF GLOBAL VALUE CHAINS -THE MOST APPROPRIATE METHOD?
	<p><i>Status of OECD Consideration - Franz Tomasek, Co-Chair of Working Party No. 6</i></p> <p>Speakers:</p> <p><i>Perry Urken, Economics Partners; Bill Sample, USCIB; Julien Pellefigue, Taj; Eduardo Martinez Lopez, Business Europe; Isabel Verlinden, PwC</i></p> <p><i>1. The most appropriate method? (Integration (and fragmentation) of functions and risks in global value chains, unique and valuable contributions, lack of comparables)</i></p> <p>Open Discussion</p>
11:00 - 11:30	Refreshment Break
11:30 - 13:15	VI. DISCUSSION DRAFT ON THE USE OF PROFIT SPLITS IN THE CONTEXT OF GLOBAL VALUE CHAINS
	<p><i>Status of OECD Consideration - Sandra Knaepen</i></p> <p>Speakers:</p> <p><i>Daniel Broekhuizen, Keidanren; Andrea Bonzano, FCA</i></p> <p><i>1. Aligning with value creation: How should profits be split?</i></p> <p><i>Elizabeth Hughes, Grant Thornton; Janine Juggins, CBI</i></p> <p><i>2. Difficulties and advantages of applying profit splits in practice</i></p> <p>Open Discussion</p>
13:15 - 14:30	Lunch
14:30 - 16:00	VII. DISCUSSION DRAFT OF THE PROPOSED MODIFICATIONS TO CHAPTER VII OF THE TRANSFER PRICING GUIDELINES RELATING TO LOW VALUE-ADDING INTRA-GROUP SERVICES
	<p><i>Status of OECD Consideration - Toshiyuki Kemmochi</i></p> <p>Speakers:</p> <p><i>Dr. Martin Zogg, Swissholdings</i></p> <p><i>1. Implementation of the simplified approach and documentation requirements</i></p> <p><i>Bruno Gibert, CMS; Paolo De Muri, Adacta Studio Associato</i></p> <p><i>2. Definition of Low Value-Adding Intra-Group Services</i></p> <p><i>Catherine Harlow, RELX Group; Dr. Sven Bremer, Siemens</i></p> <p><i>3. Issues related to the practical application of the simplified approach (shareholders activities, determination of cost pools, allocation key(s) and profit mark-ups)</i></p> <p>Open Discussion</p>
16:00 - 16:30	Refreshment Break

16:30 – 17:45	VIII. DISCUSSION DRAFT ON THE TRANSFER PRICING ASPECTS OF CROSS-BORDER COMMODITY TRANSACTIONS
	<p><i>Status of OECD Consideration - Nishana Gosai</i></p> <p>Speakers:</p> <p><i>Chu Man, Gazprom; Tatiana Falcao, BEPS Monitoring Group</i></p> <p><i>1. The use of the CUP method</i></p> <p><i>Enrique S. Mantilla, CERA; Dr. Christian E. Rosso Alba, CIARA-CEC</i></p> <p><i>2. Deemed pricing date for commodity transactions</i></p> <p><i>Dr. Stéphane Graber, STSA; Matías Olivero Vila, Taxand</i></p> <p><i>3. Value chain and comparability adjustments to the quoted price</i></p> <p>Open Discussion</p>
17:45 - 18:00	CONCLUDING REMARKS
	<p>Speakers:</p> <p>Michelle Levac, Chair of Working Party No. 6</p> <p>William Morris, BIAC</p>
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