PUBLIC CONSULTATION MEETING ON
BEPS ACTION 7 (PREVENT THE ARTIFICIAL AVOIDANCE OF PE STATUS)
to be held in room CC1 at the OECD Conference Centre on 21 January 2015

FINAL AGENDA

09:00 – 09:30 Registration

09:30 – 09:40 Introduction and consultation procedure
Andrew Dawson, Chair of Working Party 1 on Tax Conventions and Related Questions

09:40 – 09:50 General presentation of Action 7 and the discussion draft on Preventing the Artificial Avoidance of PE Status
Liselott Kana, Chair of the Focus Group on Artificial Avoidance of PE Status

09:50 – 10:00 General comments from BIAC
Will Morris, BIAC

10:00 – 11:00 General comments not related to specific options
Speakers (10 minutes max.):
Carol Dunahoo, Treaty Policy Working Group
Michael Scharf, Rödl & Partner

Questions and interventions

11:00 – 11:30 Break

11:30 – 13:00 Options A to D on Art. 5(5) and Art. 5(6)
Speakers (10 minutes max.):
Catherine Schultz, National Foreign Trade Council
Susana Bokobo, Repsol
Benjamin Shreck, Tax Executives Institute

Questions and interventions

13:00 – 14:00 Lunch

14:00 – 15:00 Option E to H on Art. 5(4) changes
Speakers (10 minutes max.):
Paul Morton, Reed Elsevier Group
Bill Dodwell, Tax Policy Group Deloitte LLP

Questions and interventions
15:00 – 15:20  **Options I –J: Anti-Fragmentation rule for Art. 5(4)**  
Speaker (10 minutes max.):  
Mary Bennett, International Alliance for Principled Taxation  
Questions and interventions  

Speaker (10 minutes max.):  
Vanessa de Saint-Blanquat, MEDEF  
Questions and interventions

15:40 – 16:10  Break

16:10 – 16:40  **Options M-N: Special rule for insurance**  
Speakers (10 minutes max.):  
Mervyn Skeet, Insurance Company Working Group  
Stephen Pautard, Association of British Insurers  
Questions and interventions

16:40 – 17:15  **Attribution of profit issues related to the proposed options**  
Speaker (10 minutes max.):  
Gary Sprague, Software Coalition  
Questions and interventions

17:15 – 17:30  **Closing remarks**  
Marlies de Ruiter, OECD, Head of the Tax Treaty, Transfer Pricing & Financial Transactions Division