

Latest
updates
on the
"Google
Tax"

Diverted Profits Tax

*Practical and in-depth guidance on the
latest tax on multinationals*

- **What?**
 - High level analysis of every element of the new legislation
 - Learn who will be affected and explore the latest example cases
- **How?**
 - Understand how to comply with the DPT rules
 - Gain practical advice on managing the notification and appeals process
- **What now?**
 - Assess DPT's place in the international tax landscape: BEPS, EU law and UK tax treaties
 - Explore new structuring options for companies
- **Hear from:**
 - 11 top tax experts
 - Q&A with HMRC

Elite speakers include:



Philip Baker QC
FIELD COURT TAX CHAMBERS



Jonathan Schwarz
TEMPLE TAX CHAMBERS



Paul Morton
REED ELSEVIER GROUP



Timothy Lyons QC
39 ESSEX STREET



Steve Edge
SLAUGHTER AND MAY

21st April • London Millennium Hotel Knightsbridge



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Diverted Profits Tax

Practical and in-depth guidance on the latest tax on multinationals

This conference is an unmissable opportunity to gain a high level overview of the latest legislation affecting multinational companies – the Diverted Profits Tax.

The so-called "Google Tax" is far broader than many envisaged, potentially affecting all large corporations or financial institutions that operate within complex cross-border structures.

This event will ensure you have all the latest information regarding the content of the new rules, know how to ensure compliance, and understand the implications of DPT for the international tax landscape. Some of the key questions which will be answered include:

- Who will be affected by the new tax?
- How do companies manage the notification and appeals process?
- Will the DPT withstand legal challenge?
- What are the options for companies looking to restructure?
- How will the DPT work within the UK's existing tax treaties?
- What are the implications for the OECD's BEPS programme?

I look forward to welcoming you on the day.

Kind regards,



Alexandra Dutson
Conference Producer
IBC Conferences

21st APRIL – MILLENNIUM HOTEL KNIGHTSBRIDGE

9.00 Registration and Coffee

9.30 **Chair's Opening Remarks**



Jonathan Schwarz

Barrister

TEMPLE TAX CHAMBERS

Jonathan Schwarz is an English Barrister at Temple Tax Chambers in London and is also a South African Advocate and a Canadian Barrister. His practice focuses on international tax disputes as counsel and as an expert and advises on solving cross-border tax problems. He is the author of Schwarz on Tax Treaties 3rd Ed and Booth and Schwarz: Residence, Domicile and UK Taxation 18th Ed.

9.40 **Diverted Profits Tax: Overview and Update**

- Where are we now?
- Latest guidance and potential changes
- DPT, BEPS and the international tax climate



Bill Dodwell

Head of Tax Policy

DELOITTE

Bill Dodwell leads Deloitte UK's Tax Policy Group which manages, amongst other things, consultations with the OECD, HM Treasury and HMRC. He is Vice President of the Chartered Institute of Taxation and chairs the CIOT's Technical Committee. He specialises in international corporate taxation.

10.20 **How Does the DPT Fit into the Wider BEPS Agenda?**



The panel will discuss the impact of the unilateral Diverted Profits Tax on the OECD's multilateral Base Erosion and Profit Shifting programme.

- BEPS Action 7 – how is it likely to develop?
- Local implementations and timeline
- Will other countries follow the UK and introduce unilateral measures ahead of BEPS?

Moderated by:



Timothy Lyons QC

Barrister

39 ESSEX STREET

Timothy Lyons, QC, has a varied practice which includes UK and EU direct and indirect tax, private client work, EU customs and WTO law and state aid law. Timothy is also Assistant Editor (European Law) of the British Tax Review, a consulting editor for the EC Tax Journal, and the author of the highly-regarded book EC Customs Law.



Paul Morton

Head of Group Tax

REEDS ELSEVIER GROUP

Paul Morton is Head of Group Tax at Reed Elsevier Group plc where he leads a global team of 25 tax professionals. The Group conducts business in more than 90 countries as LexisNexis, the science publisher Elsevier and Reed Exhibitions and Reed Business Information. He is also Deputy Chairman of the British branch of the IFA.

Previous IBC Corporate Tax delegates said:

"A good mix of industry and professionals made it very good for networking"

Lockton

To register or for the latest programme please visit: www.ibc-events.com/divertedprofits



Steve Edge

Partner

SLAUGHTER AND MAY

Steve Edge qualified with Slaughter and May in 1975 and acts for clients across the full range of the firm's practice. Steve advises on the tax aspects of private and public mergers, acquisitions, disposals and joint ventures and on business and transaction structuring (including transfer pricing in all its aspects) more generally.



Sandy Bhogal

Head of Tax

MAYER BROWN INTERNATIONAL

Sandy Bhogal heads Mayer Brown's Tax group in London. He has significant experience with corporate tax planning, as well as with advising on the development of domestic and cross-border tax-efficient structures.

11.00 Coffee Break

11.20 Analysing the Impact of DPT: Permanent Establishment

- When is there an avoided Permanent Establishment?
- Mismatch condition and tax avoidance condition
- Who is likely to be affected? Example cases
- How will the tax for foreign companies be calculated?



Heather Self

Partner

PINSENT MASONS

Heather Self is a non-lawyer Partner at Pinsent Masons with almost 30 years of experience in tax. She has been Group Tax Director at Scottish Power, worked at HMRC on complex disputes with FTSE 100 companies, and was a specialist adviser to the utilities sector. She is a member of the CBI Tax Committee and a former Chairman of the CIOT Technical committee.

12.00 Analysing the Impact of DPT: Lack of Economic Substance

- Who might be affected?
- Practical issues in computing and disputing the tax
- Insufficient economic substance



Kelly Stricklin-Coutinho

Barrister

39 ESSEX STREET

Kelly has extensive experience advising and litigating for multinationals on a wide variety of tax issues and she has been involved with litigation at every level of tax tribunal, English Court and the CJEU. Prior to joining Chambers she was a solicitor in an award winning team and worked in the legal practice of a Big 4 accounting firm.

12.40 Lunch

Previous IBC Corporate Tax delegates said:

"I am very impressed with the calibre of all individuals who made presentations. They are all experienced in their field and provide much practical and beneficial suggestions"

A Tanis, International Tax Director

1.50 View From the Revenue

Q&A session between the Chair and an HMRC representative

2.30 Practical Guidance: Notification, Charging Notices and Appeals

- Ensuring compliance with the DPT rules
- The procedure: notification, preliminary notice, representations, charging notice
- Appealing the charging notice to the Tribunal
- Interaction with other taxes and double taxation



Hartley Foster

Partner

FIELDFISHER

Hartley Foster is recognised as one of the UK's leading contentious tax practitioners. He has specialised in contentious tax matters for over sixteen years and has acted on nearly 50 reported tax cases. He focuses on the technical and tactical management of enquiries by HMRC and uses his litigious experience to negotiate with and pressurise HMRC.

3.10 Coffee Break

3.30 Will the DPT Survive Legal Challenge?

- Likely bases for challenges: freedom of establishment and freedom of movement of goods, services and capital
- What are the implications of the Cadbury Schweppes case on the UK CFC rules?
- Does the DPT conflict with the UK's tax treaties and, if so, what is the consequence?



Philip Baker QC

Barrister

FIELD COURT TAX CHAMBERS

Philip Baker QC began practice in 1987, having been a full-time lecturer in law at London University from 1979 until then. He took silk in 2002. He specialises primarily in international aspects of taxation, has a particular interest in taxation and the European Convention on Human Rights, and is the author of a book on Double Taxation Conventions.

4.10 Exploring Restructuring Options Post-DPT

- How can foreign companies restructure?
- How can UK based companies restructure?
- Examples for specific industries



Miles Dean

Managing Partner

MILESTONE INTERNATIONAL TAX PARTNERS

Miles is a founder of Milestone International Tax Partners. He is the co-author of International Tax Systems and Planning Techniques (Sweet & Maxwell) and The Principles of International Tax Planning (Corpus), as well as numerous academic articles.

4.50 Chair's Summation and Close of Conference

Previous IBC Corporate Tax delegates said:

"A good mix of industry and professionals made it very good for networking"

Lockton

Diverted Profits Tax

21st April - London Millennium Hotel Knightsbridge

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21st April - London Millennium Hotel Knightsbridge
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