

Invitation: Register now!

International Tax Conference

“Digitalisation and the Future of Profit Taxation”

June 29th, 2018 in Munich, Germany

We would like to invite you to our International Tax Conference. In view of the fact that digitalisation and the taxation of the digital economy is a pertinent topic on the global tax agenda, there is a strong need to have a broader discussion on the implications and opportunities of these developments. In cooperation with ICC, BIAC and BusinessEurope, we will discuss tax policy issues in this area, such as digitalisation of tax and tax functions; taxation of digital business models; and the future of profit taxation in the light of digitalization and the ever growing importance of IP in the value chain. Furthermore, as the implementation of BEPS in national jurisdictions as well as in the treaty network is progressing, dispute prevention and dispute resolution are becoming more crucial and will also be discussed. The conference will be divided into four sessions, each being composed of an interview and followed by a panel discussion with distinguished speakers.

8:30 Arrival of the participants/Welcome coffee

9:00 – 9:15 **Welcome**
Georg Geberth, Chairman, Tax Committee of the Federation of Bavarian Industries; Vice Chair, BIAC Committee on Taxation and Fiscal Affairs; Director Global Tax Policy, Siemens
Bernhard Welschke, Secretary General, Business at OECD (BIAC)

9:15 – 9:30 **Opening Speech**
Werner Brandt, President ICC Germany

Session 1 on Digitalisation of Tax and Tax Functions

Digitalisation creates widespread changes in society, the economy and government; with internet, social media, big data and automation altering the landscape. Tax systems are an integral part of this picture and recent years have seen a shift by tax administrations to digitalise taxes as they recognise the potential to revolutionise compliance and enquiry work. Beyond being an efficiency measure, digitalisation can transform how a tax system functions. It can reduce the administrative burden both for tax authorities as well as for taxpayers themselves, and in addition make the process of compliance simpler. This session discusses how innovations such as online tax accounts, blockchain, risk assessment based on algorithms, greater automation (including artificial intelligence) and greater access to data could combine to provide taxpayers with systems that are easier and more secure to interact with, and at the same time gives tax administrations the data they need in more accurate and more timely ways.

9:30 – 9:55 Introduction by **Kristen Andersson**, representing BusinessEurope and Interview with **Maria Teresa Fabregas**, EU-Commission

9:55 – 10:45 Panel discussion
Fritz Esterer, Chief Executive Officer, WTS (**Moderator**)
Kristen Andersson, Chairman, Tax Committee, BusinessEurope
Maria Teresa Fabregas, Director Tax Administration, EU-Commission
Thomas Eisgruber, Head of Department, Taxation of Corporations, International Taxation and Audit, Bavarian Ministry of Finance
Hans Maier, Head of Group Taxation, Bosch

10:45 – 11:15 Coffee Break

Session 2 on the Taxation of Digital Business Models

The digital economy is not only revolutionising the way businesses operate but also creates new opportunities for global growth and prosperity. Technological advances and digital connectivity can spur innovation in business models, business networking and knowledge transfer while also facilitating access to international markets for businesses of all sizes. There is broad international consensus that the digital economy cannot be “ring-fenced” from the rest of an increasingly digitalised economy. As digitalisation continues to be an important driver for global economic growth, any discussions around the taxation of the digital economy should promote, and not hinder, growth and cross-border trade and investment. A separate taxing system for “digital companies” could be burdened with challenges that would create uncertainty, inhibit cross-border trade and investment and increase double taxation. This session discusses the implications of digitalised business models and their value chain on tax policy; including existing tax bases, structures of tax systems and the distribution of taxing rights between countries.

11:15 – 11:40 Introduction by **Wolfgang Schön**, MPI and Interview with **Gaël Perraud**, French Ministry of Finance

11:40 – 12:30 Panel discussion
Franz zu Hohenlohe, Member of the Board, WTS (**Moderator**)
Wolfgang Schön, Managing Director Max-Planck-Institut (MPI), Munich; Honorary Professor at Ludwig-Maximilians-University Munich
Gaël Perraud, Deputy Director for Prospective and International Affairs, Tax Legislation Directorate, French Ministry of Finance (**tbc**)
Eric Robert, Tax Advisor, Taxation and the Digital Economy, OECD
Monika Wünnemann, Head of Finance and Taxation, BDI
Maria Teresa Fabregas, Director Indirect Taxation, EU-Commission

12:30 – 14:00 Lunch & Luncheon Speech by

Session 3 on Dispute Prevention and Dispute Resolution

A large increase in the number of tax disputes as a result of the BEPS Project is being expected. Furthermore, the implementation of the Multilateral Instrument by some countries will give rise to further tax disputes. Dispute Prevention instruments – such as Cooperative Compliance Programs or Joint Audits – aim at reaching an agreement, before disputes arise. They ensure that companies can get certainty as swiftly as possible on the amount of tax they must pay – and in advance of making business decisions wherever possible. Dispute Prevention will obviously not always be possible. It is therefore crucial to make the next level, Dispute Resolution, more effective. Especially in the context of the implementation of BEPS recommendations, instruments such as the Mutual Agreement Procedure (MAP) and Binding Arbitration could play an important role in reducing double taxation. This session discusses how to make Dispute Prevention and Dispute Resolution more effective, thus encouraging domestic and international investment and trade.

14:00 – 14:25 Introduction by **Christian Kaeser**, representing ICC and Interview with **Michael Lennard**, United Nations

14:25 – 15:15 Panel discussion

Bernard Peeters, Partner, Tiberghien (**Moderator**)

Christian Kaeser, Chairman, ICC Commission on Taxation; Global Head of Taxes, Siemens; Professor at Vienna University of Economics and Business

Michael Lennard, Chief of International Tax Cooperation and Trade in the Financing for Development Office (FfDO) of the United Nations

Achim Pross, Head of Int. Co-operation and Tax Administration, OECD (**tbc**)

Janine Juggins, Executive Senior Vice President Global Tax, Unilever

15:15 – 15:45 Coffee Break

Session 4 on the Future of Profit Taxation

At the heart of the debate on taxation of the digital economy is the pressure that digitalisation places on the concept of having a “presence” in a market, and more specifically how this interacts with the traditional notion of permanent establishment. Furthermore the ever growing importance of IP in global value chains also puts pressure on the international tax system. With this increasing pressure to establish solutions, a number of potential options or unilateral measures are being considered to address the broader tax challenges. Amongst these, are proposals for a turnover based tax for digital businesses and other tax reforms which are not in line with the traditional concept of profit taxation. The BEPS process developed standards determining where value is created, reinforcing internationally accepted principles of taxing corporate profits. A turnover tax/equalization levy represents a fundamental shift from these generally established principles. This session discusses the potential risks and opportunities with respect to the future of profit taxation in this context.

15:45 – 16:10 Introduction by **Will Morris**, representing BIAC and Interview with **Timothy Power**, Deputy Director Corporate Tax, HM Treasury

16:10 – 17:00 Panel discussion

Wim Wuyts, CEO WTS Global (**Moderator**)

Will Morris, Chairman, BIAC Committee on Taxation and Fiscal Affairs;
Deputy Global Tax Policy Leader, PwC

Timothy Power, Deputy Director Corporate Tax, HM Treasury (**tbc**)

Carol Doran Klein, Vice President and International Tax Counsel, USCIB

Wolfgang Schön, Managing Director Max-Planck-Institute (MPI), Munich;
Honorary Professor at Ludwig-Maximilians-University Munich

17:00 – 17:15 Wrap Up

Venue, Date and Time

→ **Friday, June 29th, 2018 from 9.00 a.m. to 5.15 p.m.**

→ hbw | ConferenceCenter | Haus der Bayerischen Wirtschaft
Max-Joseph-Straße 5 | 80333 Munich | Germany

→ The conference will be held in English.

Participation and Registration

If you have any questions, please do not hesitate to contact Heidi Jackelsberger
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If you need an overnight stay, please contact:

Eden Hotel Wolff | Arnulfstrasse 4 | 80335 Munich, Germany | www.eden-hotel-wolff.de
Phone +49 (0) 89 55 11 5-0 | info@ehw.de

The quota can be accessed until June 1, 2018. Single room EUR 144,00 incl. breakfast.
Keyword: ITC Munich

Some more hotels in the centre of Munich: anna Hotel, www.annahotel.de

Platzl Hotel, www.platzl.de | LOUIS Hotel, www.louis-hotel.com

Please note, there is no quota for these hotels.

For your leisure time please visit the website of "Explore Munich" with some sights and attractions: www.muenchen.de/int/en.html

We look forward to welcoming you.