

# INTERNATIONAL BUSINESS STRUCTURING IN THE DIGITAL ECONOMY



Minimising business risks through transparency and future-proof planning

3 June 2014 | The Mandarin  
Oriental Hyde Park | London, UK

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**IBSA**  
International Business  
Structuring Association

## KEYNOTE SPEAKER



**Raffaele Russo**  
Head of BEPS Project  
OECD

## FEATURED SPEAKERS



**Andrew Hewitt**  
Head of Tax  
ASOS.com



**Andrew Horton**  
Director  
IPC Media, Time  
Warner



**Gary Howlett**  
Global Tax Director  
Kaspersky Lab



**Harm J. Oortwijn**  
Director of  
International Tax  
Paramount Pictures



**Keith Brockman**  
EMEA Tax Director  
Mars Inc.



**Paul Morton**  
Director of Tax  
Reed Elsevier

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Continued investment in digitisation across all industries has led to the creation of innovative business models that leverage cloud-based enterprise solutions and online distribution channels. In this changing landscape, businesses, regulators and advisors need to engage in a meaningful dialogue to establish clear, certain and practical regulatory frameworks to guide international business structuring best practices.

The International Business Structuring in the Digital Economy conference provides a platform for all stakeholders to consider proposed regulatory changes, addressing the most pressing issues of international electronic commerce taxation, IP valuation, transfer pricing and permanent establishment risk. A holistic approach and close cooperation are essential to move forward in solving this complex global challenge. We invite you to be a part of the discussion.

What questions are we asking at the 2014 conference?

## KEYNOTE PRESENTATION:

What implications do digital economy trends have on global business structuring and taxation practices?

## SESSION ONE:

How can the value of IP be defined across jurisdictions and across vastly different digital business models?

## SESSION TWO:

How can a coherent, clear, fair transfer pricing framework be created to facilitate the global growth of innovative digitalised businesses?

## SESSION THREE:

What are the immediate and long-term implications of developments in the digital economy on international legislative systems? Will new concepts, such as "virtual permanent establishment", emerge from the regulatory debate?

## SPONSOR THE CONFERENCE

REINFORCE YOUR POSITION AS A LEADING PLAYER BY BECOMING THE CONFERENCE SPONSOR:

Contact Michael Nocetti on +44 (0) 20 3747 3016 or michael.nocetti@istructuring.com to learn about sponsorship opportunities.

# CONFERENCE PROGRAMME

08:30 REGISTRATION

09:00 **CHAIRMAN'S INTRODUCTION**  
**Roy Saunders**, Founder and Chairman, IBSA

09:05 **KEYNOTE PRESENTATION: THE BEPS PROJECT AND THE TAX CHALLENGES OF THE DIGITAL ECONOMY**

- › The overview of the OECD/G20 BEPS project: progress to date and future developments
- › Tax challenges of the digital economy: how has digitalisation transformed the global economy?
- › Creating a sustainable regulatory ecosystem for the development of digital economy

**Raffaele Russo**, Head of BEPS Project, OECD

09:50 NETWORKING BREAK

## IP IN THE DIGITAL ECONOMY: STRUCTURING IMPLICATIONS OF EMERGING BUSINESS MODELS

10:00 **RAISING AWARENESS OF THE VALUE OF IP IN THE INTERNATIONAL KNOWLEDGE ECONOMY**

- › Creating economic value through innovation and investment in intangible property
- › European Commission IP expert group recommendations: bottlenecks of creating the Innovation Union
- › Enabling EU Single Market to compete in attracting investment in innovative business ideas

**Roya Ghafele**, Director, Oxfirst

10:30 **EFFECTIVE INTERNATIONAL IP STRUCTURING AT A DIGITAL CORPORATION**

- › What aspects of IP valuation are not well understood?
- › What affects the costs of the cross-border IP transactions?
- › Improving IP valuation method application: how to ensure valuation is conducted properly?

**Andrew Caldwell**, Director, Berkeley Research Group

11:00 **PANEL DISCUSSION**

- › Understanding the value of IP for digital business models
- › How to provide solid basis for an accurate IP valuation?
- › Legal implications business function centralisation trend

**Nav Sunner**, Commercial Director, Microsoft

**Andrew Horton**, Director, IPC Media, Time Warner

11:30 NETWORKING BREAK

## THE FUTURE OF TRANSFER PRICING: ALIGNING BUSINESS AND TAX OBJECTIVES

- 12:00**    **POTENTIAL IMPLICATIONS OF THE BEPS PROJECT ON INTERNATIONAL TAX SYSTEMS**
- › Defining the scope of digitisation: should digital enterprises be taxed differently?
  - › Transfer pricing aspects of the BEPS action plan: expected developments for the digital economy
  - › Minimising uncertainty in interpretation and application of transfer pricing rules
  - › Considering indirect taxation consequences of the proposed BEPS transfer pricing requirements

**Andrew Hewitt**, Head of Tax, **ASOS.com**

- 12:30**    **BEST PRACTICES IN TRANSFER PRICING RISK MANAGEMENT**
- › Raising interdepartmental awareness of transfer pricing risks during business restructuring
  - › Development and implementation of effective transfer pricing risk management strategies
  - › The role of transfer pricing risk assessment in overall corporate risk governance framework

**Keith Brockman**, EMEA Tax Director, **Mars Inc.**

- 13:00**    **THE CHALLENGES OF TRANSFER PRICING IN RAPID GROWTH MARKETS**
- › Global perspective on IP, transfer pricing and taxation in emerging countries: Asian experience
  - › Considering cultural aspects of coordinating global transfer pricing policies
  - › Understanding transfer pricing in the context of price determination, not year-end results

**François Thomas**, former Senior Tax Counsel, **Michelin**

- 13:30**    **LUNCH BREAK**

## DEALING WITH UNINTENTIONAL PERMANENT ESTABLISHMENT EXPOSURE RISK

- 14:30**    **PANEL DISCUSSION**
- › Is there a need for fundamentally new standards on international corporate taxation?
  - › Prioritising clarity and stability in the discussion of the digital economy regulation
  - › The implications of proposed OECD regulatory updates on business structuring practices
  - › How to deliver a tax policy that is practical and achievable from the business perspective?

**Jose Villoldo**, EMEA Tax Director, **Omnicom**  
**Robert Kiggins**, Partner, **Culhane Meadows**

- 15:20**    **NETWORKING BREAK**

- 15:40**    **PERMANENT ESTABLISHMENT AND THE DIGITAL ECONOMY: HOW IS INTERNATIONAL TAX LAW ADAPTING TO NEW BUSINESS REALITIES**

- › How do current PE rules deal with electronic transactions?
- › Are we moving towards the introduction of the virtual PE concept?
- › How do proposed OECD guidelines impact tax treaties and domestic tax legislation?

**Paul Morton**, Director of Tax, **Reed Elsevier**

- 16:10**    **THE EVOLUTION OF INTERNATIONAL TAXATION: TWO DECADES IN HI-TECH**

- › How to develop a corporate structure consistent with the overall business strategy
- › What defines the success or failure of a major corporate relocation: lessons from an award-winning HQ move
- › The challenges of designing tax efficient European supply chains for the US corporations
- › What makes the UK attractive for growing international businesses?

**Gary Howlett**, Global Tax Director, **Kaspersky Lab**

- 16:40**    **WILL THE PROPOSED REGULATORY CHANGES CREATE FAIR, TRANSPARENT AND SUPPORTIVE BUSINESS ENVIRONMENT?**

- › Are the proposed OECD regulations in tune with the modern business practices?
- › What implications does country-by-country reporting have on corporate operational costs?
- › Do the OECD guidelines create additional risk of unintended PE for multinational enterprises?
- › How can transparency requirements benefit all stakeholders and support commercial growth?

**Harm J. Oortwijn**, Director International Tax, **Paramount Pictures**

- 17:10**    **CHAIRMAN'S SUMMARY AND CONFERENCE CLOSURE**

# REASONS TO ATTEND

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## LEARN FROM THOUGHT LEADERS

Participate in discussion with industry thought leaders

## DEVELOP YOUR PROFESSIONAL NETWORK

Make meaningful connections and grow your referral network

## DISCOVER CASE STUDIES ACROSS INDUSTRIES

Learn new ideas, industry tips and insider trends

## TOP INDUSTRY SPEAKERS

Presentations and discussions are structured to provide insights into the commercial realities of multinational business structuring. You will learn how modern global enterprises are reimagining themselves in the digital age from decision makers responsible for directing and executing new business strategies.

## EXCLUSIVE CONTENT

The IBSA works to build a multidisciplinary, multi-industry global community of business structuring professionals. Conference attendees come from diverse backgrounds but are connected by their commitment to creating sustainable, compliant, transparent business structures.

## INTERACTIVE FORMAT

The conference is structured to maximise delegate, speaker and partner networking time. In 2014 we have extended the attendee Q&A time during presentations, introduced panel discussions at the end of each session and included plenty of networking breaks in the programme for you to meet and connect with other like-minded professionals.

## PROFESSIONAL COMMUNITY

The IBSA works to build a multidisciplinary, multi-industry global community of business structuring professionals. We believe that meaningful conversations can only take place when professionals share their values and are driven by the same goals. Conference attendees come from diverse backgrounds but are connected by their commitment to creating and maintaining sustainable business structures compliant with international transparency, corporate governance and social responsibility best practices.

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## PRICING

**Standard rate:** £875 + VAT, **IBSA member rate:** £700 (20% discount) + VAT

## DELEGATE INFORMATION - Please copy this form for multiple delegates

Salutation (Mr/Mrs/Ms) \_\_\_\_\_

Last Name \_\_\_\_\_

Company \_\_\_\_\_

Postcode / Zip \_\_\_\_\_

Email Address (direct) \_\_\_\_\_

Cell/Mobile Phone (direct) \_\_\_\_\_

First Name \_\_\_\_\_

Job Title \_\_\_\_\_

Address \_\_\_\_\_

City \_\_\_\_\_

Country \_\_\_\_\_

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## PAYMENT INFORMATION

I would like to pay by:  Credit Card  Bank transfer  Cheque  Invoice

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Bank Address

Sort Code

Account Number

SWIFT Code

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Purchase Order Number

**PLEASE PROVIDE CREDIT CARD ADDRESS IF THE CARD IS REGISTERED TO A DIFFERENT ADDRESS FROM THAT ABOVE**

### CREDIT CARD PAYMENT: PLEASE COMPLETE WITH YOUR CORPORATE CARD DETAILS

Please debit my:



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All bookings require a signature. By signing this document, I agree to the cancellation policy set out in the terms and conditions below and am authorised on behalf of the client to sign in this document.

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