

Strategic International Senior Executive Forum

2nd CORPORATE TAX STRATEGY FORUM

Optimising the strategic and operational effectiveness of your international corporate tax function

31 May & 1 June 2006, Hotel Barcelona Princess, Barcelona

With the participation of leading experts:

Eric FitzGerald	Principal Administrator, Unit Direct Tax Legislation, Directorate-General Taxation and Customs Union	EUROPEAN COMMISSION
Karl-Heinz Engelmann	Head of Tax	QIMONDA AG
Werner Stuffer	Tax Director International	SIEMENS
Dr. Alexander Vögele	Chairman of the Advisory Board	NERA ECONOMIC CONSULTING
Pim Fris	Special Consultant	NERA ECONOMIC CONSULTING
Claude-Alain Sollberger	Regional Head of Tax Europe	DHL & DEUTSCHE POST
Susan Rogers	Head of Global Tax Policy	BP
Margareta Leijonhufvud	Group Chief Tax Officer	NORDEA
Michel Fabre	Head of Tax & Customs Group	AIRBUS
Mike Sufrin	Director of Tax	ROLLS-ROYCE
Hans-Peter Seis	Head of Global Tax Audit & Domestic Taxes	HENKEL KGaA
Raymund Gerardu	Senior Vice President Group Taxation	ADECCO
Thierry Cornu	Manager Europe, Africa & Middle East Tax Center	EXXONMOBIL PETROLEUM & CHEMICAL
Andres Sanchez Lopez	Partner	CUATRECASAS
Alan McLean	Head of Tax Practices	SHELL INTERNATIONAL
Carmine Rotondaro	Worldwide Tax and Real Estate Director	GUCCI GROUP N.V.
Wim Wuyts	Group Tax Director	AGFA
Giles Parsons	Director European Tax Services	CATERPILLAR

ATTEND THIS 2ND CORPORATE TAX STRATEGY FORUM TO LEARN FROM LEADING GLOBAL CORPORATIONS SPEAKING ON:

- Investigating current and future tax regulation and legislation developments
- Implementing effective tax management for multi-national corporations
- Improving tax planning and tax compliance globally
- Calculating tax on a global level
- Managing transfer pricing effectively whilst overcoming documentation issues
- Successful tax risk management and the evolving role of the Tax Director
- Tax implications regarding financing issues

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8:45 Opening remarks from the Chairperson

Pim Fris – Special Consultant
NERA ECONOMIC CONSULTING

9:00 Introductory Speed Networking

Brief networking introduction with your peers for a few minutes to become acquainted with your fellow attendees

9:15 THE COMMISSION STRATEGY FOR CORPORATE TAXATION – TARGETED MEASURES AND COMPREHENSIVE SOLUTIONS

- Targeted measures; hardlaw developments and softlaw initiatives
- Hardlaw; the EC company Tax Directives, including recent amendments; the arbitration convention
- Softlaw; codes of conduct for transfer pricing, tax treaty workshop, communications and recommendations
- Comprehensive solutions; Home State Taxation (HST) and the Common Consolidated Corporate Tax Base (CCCTB)
- HST; commission communication
- CCCTB; state-of-play and future prospects
- ECJ caselaw; main developments

Eric FitzGerald – Principal Administrator, Unit Direct Tax Legislation, Directorate-General Taxation and Customs Union
EUROPEAN COMMISSION

10:00 TAX DEPARTMENT OPTIMISATION – BEST PRACTICES FOR TAX DEPARTMENT ORGANISATION

- Defining, creating and optimising your tax strategy and policies in a global environment
- Structuring your tax organisation internally for efficient roll out and tax management
- Interacting with other tax departments in your company worldwide
- Re-structuring activities efficiently
- Due to increased complexities how are multi-nationals organising their tax departments?
- Evaluating whether to streamline or increase the size and scope of your in-house activities

Karl-Heinz Engelmann – Head of Tax
QIMONDA AG

10:45 Benchmarking Coffee Break

11:15 TAX PLANNING, POLICY AND ORGANISATION AT SIEMENS

- Investigating how Siemens plan tax globally; effectively managing planning issues for a multi-national company
- What is the most effective way to create your tax policy and organise tax within a group of companies?
- Exploring the new role of Tax Directors and tax departments with regards to increased complexities
- Re-structuring activities efficiently to increase your tax activities

Werner Stuffer – Tax Director International
SIEMENS

12:00 INVESTIGATING A WIN-WIN SITUATION OF TRANSFER PRICES FOR RISKS

- Calculating, valuating and remunerating risks
- Exploring hedges, options and insurance premiums
- Considering business risks, tax risks and entrepreneurial risks
- Maximising tax effective risk management centres

Dr. Alexander Vögele – Chairman of the Advisory Board – NERA ECONOMIC CONSULTING
Pim Fris – Special Consultant
NERA ECONOMIC CONSULTING

12:45 Benchmarking Lunch

14:00 COMMUNICATING WITH AND ORGANISING TAX EXECUTIVES COMPANY WIDE

- The importance of communicating with tax executives in division / subsidiaries offices
- Keeping ahead of local jurisdictions regulations and compliance through proactive communication
- Accelerating processes through sharing knowledge, legal know-how and experience company wide; involving tax executives in strategy procedures
- Verifying the standard of your own tax organisation through internal critical analysis

Claude-Alain Sollberger – Regional Head of Tax Europe – DHL & DEUTSCHE POST

14:45 MANAGING TAX POLICY ISSUES GLOBALLY WITH RESPECT TO FISCAL ENVIRONMENT RISKS AND OPPORTUNITIES

- Identifying key external fiscal threats and establishing risk mitigation plans and processes to manage those risks through influence, advocacy and appropriate business intervention
- Identifying key fiscal opportunities designed to create value through Government fiscal policy reviews of tax systems and treaties
- Considering why a global company should coordinate its government advocacy activities on tax issues in its countries of operation through a worldwide internal company network and how to implement such a network
- Working with business units and company government affairs personnel on tax policy issues in order to achieve key business goals

Susan Rogers – Head of Global Tax Policy – BP

15:30 Benchmarking Coffee Break

16:00 OVERCOMING DOCUMENTATION ISSUES IN TRANSFER PRICING

- Handling documentation requirements and issues across multi-national organisations and networks of inter-companies
- Keeping up-to-date on new guidelines for transfer pricing and documentation in each country
- Standardising documentation; the way forward

Margareta Leijonhufvud – Group Chief Tax Officer
NORDEA

16:45 TAX MANAGEMENT AND MANAGING TRANSFER PRICING ISSUES SUCCESSFULLY; THE CASE STUDY OF AIRBUS

- Creating and managing your tax strategy in a multi-national global environment
- Effective and efficient internal tax structures company wide
- Exploring how Airbus signed the 1st quadrilateral APA two years ago
- Being prepared for a transfer pricing audit

Michel Fabre – Head of Tax & Customs Group
AIRBUS

17:30 Closing remarks from the Chairperson

17:45 Spanish Evening Reception

Meet & Network with fellow conference participants over drinks & tapas in a convivial atmosphere

2nd CORPORATE TAX STRATEGY FORUM
DAY TWO: THURSDAY 1 JUNE 2006, HOTEL BARCELONA PRINCESS, BARCELONA

3:45 Opening remarks from the Chairperson
Dr. Alexander Vögele – Chairman of the Advisory Board – NERA ECONOMIC CONSULTING

9:00 CALCULATING THE TAX CHARGE ON A GLOBAL LEVEL

- What factors influence the calculation?
- How can you be in total control on a global scale?
- What is the "right" tax rate?
- What are the analysts looking for?
- Ensuring transparency for accountants so you can demonstrate how you arrived at the numbers and minimise any 'surprises'
- Creating a system that is auditable by the auditors
- Provisions
- Maximising shareholder value and the moral dimension

Mike Sufirin – Director of Tax – ROLLS-ROYCE

9:45 TAX AUDIT ACCELERATION PROCEDURES

- Tax audit cycles and acceleration procedures
- Evaluating key drivers to access acceleration
- Investigating how Henkel have developed this method
- Preparation and guidelines for a tax audit
- Investigating the digital tax audit
- Henkel's IT program; tax audit database and tax audit balance sheet module

Hans-Peter Seis – Head of Global Tax Audit & Domestic Taxes – HENKEL KGaA

10:30 Benchmarking Coffee Break

11:00 THE CHANGING WORLD OF THE HEAD OF TAX

- Shifting of focus by external and internal tax stakeholders
- Looking at tax planning and tax risk management in the world of corporate governance
- How new tax accounting, disclosures and SOX rules impact tax departments / controller organisations

Raymund Gerardu – Senior Vice President Group Taxation – ADECCO

11:45 AUTOMATION AND OPTIMISATION OF INDIRECT TAX COMPLIANCE PROCESSES

- Sharing experience as a tax department of a large multinational in the worldwide implementation of an integrated common automation platform
- Discussing the associated challenges
- Exploring opportunities such as the centralisation of compliance work in Business Service Centers

**Thierry Cornu – Manager Europe, Africa & Middle East Tax Center
EXXONMOBIL PETROLEUM & CHEMICAL**

12:30 Benchmarking Lunch

13:45 PANEL DISCUSSION – TAX IMPLICATIONS AND CONCERNS REGARDING FINANCING ISSUES

- Internal and external financing; what are the issues surrounding tax and how can you manage them?
- Country differences in intra-financing problems
- What are the conditions of intra group financing?
- The increasing relevance of tax risk management
- Tax optimised financing

- Exploring transfer pricing issues
- Facilitator: Andres Sanchez Lopez – Partner CUATRECASAS**
Panel Members:
Giles Parsons – Director European Tax Services CATERPILLAR
Hans-Peter Seis – Head of Global Tax Audit / Domestic Taxes – HENKEL KGaA
Carmine Rotondaro – Worldwide Tax and Real Estate Director – GUCCI GROUP N.V.
Michel Fabre – Head of Tax & Customs Group AIRBUS
Raymund Gerardu – Senior Vice President Group Taxation – ADECCO
Alan McLean – Head of Tax Practices SHELL INTERNATIONAL

14:45 MANAGING TRANSFER PRICING ISSUES EFFECTIVELY

- Investigating trends in various countries and tax authorities; considering transfer pricing methods
- Incorporating new transfer structures in your strategies
- Developing and being ready for transfer pricing audits; experiences in tax audits
- Using the approach and concept of real transfer pricing; finding comparables
- Managing transfer pricing for intellectual property; the impact on taxes
- Managing transfer prices in selected emerging countries

Carmine Rotondaro – Worldwide Tax and Real Estate Director – GUCCI GROUP N.V.

15:30 Benchmarking Coffee Break

16:00 TAX RISK MANAGEMENT; EXAMINING FRAMEWORKS, TOOLS AND TECHNIQUES

- Successfully handling tax risk management; minimising risk over all strategies – transactional, operational, reputation, compliance and financial
- Organising your tax function and optimising your organisation to build in best practice controls and checks to minimise tax risk
- Examining the evolving role of the Tax Director in risk management

Wim Wuyts – Group Tax Director – AGFA

16:45 ASSESSING TAX COMPLIANCE STRATEGIES IN AN INCREASINGLY COMPLIANT ENVIRONMENT

- Ensuring awareness of tax laws globally
- Effectively dealing with regulatory pressure
- How can you make sure you are 100% compliant worldwide?
- Restructuring resources; balancing your daily workload with being compliant

Giles Parsons – Director European Tax Services CATERPILLAR

17:30 Closing remarks from the Chairperson and close of the Conference