

Corporate Tax Symposium 2019

USA, EU, OECD, Germany, Switzerland: Quo Vadis?

Speakers:

Barbara Angus, EY, former Ways & Means Committee, U.S. House of Representatives

Dr. Vikram Chand, University of Lausanne

Joseph Czajkowski, former Exxon Mobil Corporation

Manuel de los Santos, OECD

Dr. Pia Dorfmueller, P+P Pöllath + Partners

Peter Dormann, Johnson & Johnson - Cilag International GmbH

Dr. Markus Frank Huber, Biogen International GmbH

Adrian Hug, Federal Tax Administration

Prof. Dr. Georg Kofler, JKU

Prof. Dr. René Matteotti, University of Zurich and Tax Partner AG

Dr. Andreas Risi, UBS AG

H. David Rosenbloom, NYU Law School and Caplin & Drysdale

Robert Stack, Deloitte (former U.S. Department of Treasury)

Moderator:

Dr. Peter R. Altenburger, Founding Member and Counsel

Altenburger Ltd legal + tax

Tuesday, November 26, 2019

8:00 a.m. – 5:30 p.m. incl. coffee breaks and lunch

Zurich Marriott Hotel, Neumühlequai 42, Zurich

Content / Goals of Seminar:

With the implementation of the historic U.S. Tax Reform, strong developments in the OECD Project BEPS, the new OECD program “Inclusive Framework”, Digital Services Taxation, many changes in tax legislation in around the world, the fiscal environment looks erratic and unplannable. Who will win, who will lose? What are the macro-economic consequences for involved countries? And what surprises lurk just beyond the horizon?

These and many other questions will be discussed by eminent experts based in the U.S., in the OECD, in the EU and in Switzerland. Participants will come out of this seminar with a better understanding of the global fiscal landscape, more knowledge about the facts – and certainly a better grip on the key questions.

Target Group:

- Senior Tax Professionals of international companies
- Senior representatives of the tax service providers
- Representatives from federal, cantonal and communal fiscal authorities

Pricing:

Members: CHF 950.00 (incl. 7.7% VAT)
Non-Members: CHF 1200.00 (incl. 7.7% VAT)

Prepayment required. Fee includes material, coffee break, lunch break and cocktails.

Registration:

Please use the enclosed form to register for this seminar. Upon receipt of payment or credit card information, the registration will be confirmed by e-mail and is considered firm unless cancelled in writing (e-mail).

Registration deadline: November 6, 2019.

Cancellation deadline: November 15, 2019. After this date, the full price will be charged as no-show fee. Replacements are welcome.

Administration:

Swiss-American Chamber of Commerce
Talacker 41
CH 8001 Zurich
events@amcham.ch
Tel: +41 43 443 72 00

Program:

- 08.00 Registration of guests - welcome coffee
- 08.30 Welcome / Introduction by Peter R. Altenburger
- 08.40 Barbara Angus: Taxation of Digital Economy
- 09.10 Robert Stack: G20 Certainty Agenda / OECD Developments on Improving Certainty for Taxpayers and Investment Climates in Countries
- 09.40 Manuel de los Santos: Inclusive Framework's Work on the Tax Challenges of the Digitalisation of the Economy
- 10.10 Coffee break
- 10.30 Georg Kofler: Relevant Developments in the EU
- 11.00 Adrian Hug: Consequences for Swiss Economy
- 11.30 Vikram Chand: MLI and its impact on Switzerland
- 12.00 Lunch break (buffet lunch)
- 13.00 René Matteotti: Next Swiss Tax Regime on IP
- 13.30 Andreas Risi: Legacies and EOIR
- 14.00 Workshops 1a, 1b and 1c
- 15.00 Coffee break
- 15.30 Workshops 2a and 2b

Workshops (to be selected by participants):

- Workshop 1a: Peter Dormann / Markus Frank Huber:
Countdown for the Classical Principles of Corporate Taxation
- Workshop 1b: Joe Czajkowski / Vikram Chand:
Taxation of U.S. MNEs with Operations in Switzerland:
U.S. and Swiss Perspectives
- Workshop 1c: Pia Dorfmueller / Georg Kofler:
European Taxation
- Workshop 2a: René Matteotti / H. David Rosenbloom:
Cross-border Aspects of IP Transfers
- Workshop 2b: Barbara Angus / Robert Stack:
What's next in U.S. Corporate Taxes?

Speakers in alphabetical order:

Barbara Angus, Global Tax Policy Leader EY, former Chief Tax Counsel, Ways & Means Committee, U.S. House of Representatives

Dr. Vikram Chand, Executive Director, International Tax Education, University of Lausanne

Joseph Czajkowski, former Senior Tax Counsel, Exxon Mobil Corporation, Texas

Manuel de los Santos, CTPA Transfer Pricing Advisor, OECD, Paris

Dr. Pia Dorfmueller, Tax Advisor, Partner, P+P Pöllath + Partners, Frankfurt

Peter Dormann, Tax Director at Johnson & Johnson - Cilag International GmbH, Zug

Dr. Markus Frank Huber, Head of European Tax, Biogen International GmbH, Zug

Adrian Hug, Director Federal Tax Administration, Berne

Prof. Dr. Georg Kofler, LL.M. (NYU), Head of the Tax Institute, JKU, Linz

Prof. Dr. René Matteotti, Professor of Law, Chair in Swiss, European and International Tax Law, University of Zurich, Zurich. Attorney at Law, Tax Partner AG, Zurich

Dr. Andreas Risi, Managing Director, Head of Tax Switzerland, UBS, Zurich

H. David Rosenbloom, Director of the International Tax Program of NYU Law School and Partner of Caplin & Drysdale, Washington D.C.

Robert Stack, Managing Director, Washington National & International Tax, Deloitte (former Deputy Assistant Secretary for International Tax Affairs at the U.S. Department of Treasury), Washington D.C.

Moderator:

Peter R. Altenburger, Founding Member and Counsel, Altenburger Ltd legal + tax, Kusnacht

Corporate Taxes Symposium 2019

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Full day seminar on November 26, 2019

I will attend

- Member (CHF 950.00)
(Swiss-American Chamber of Commerce or Europa Institut)
- Non-Member (CHF 1200.00)

Name / Position: _____

Company, full address for invoice: _____

E-Mail: _____

Tel: _____

Special Insight Sessions in the afternoon

Workshop session 1:

- (a) Countdown for the Classical Principles of Corporate Taxation
- (b) Taxation of U.S. MNEs with Operations in Switzerland:
U.S. and Swiss Perspectives
- (c) European Taxation

Workshop session 2:

- (a) Cross-border Aspects of IP Transfers
- (b) What's next in U.S. Corporate Taxes?

Registrations are considered firm upon payment of the full registration fee (payable within 10 days after receipt of invoice).

Registration deadline: November 6, 2019

Please note: Full no-show charge unless registration is cancelled until November 15, 2019. Replacements are welcome.

Send registration to bettina.asaf@amcham.ch,

Date / Signature: _____