

October 9-10, 2019  
Lisbon, Portugal

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# Tax Directors Meeting

## **BEPS 2.0 - Paradigm shift in global taxation**

- » In search of purpose and substance - Current struggles of tax practitioners
- » BEPS 2.0 and VAT challenges of data-driven business models
- » How companies deal with DAC6 compliance in the day-to-day business

<b>Keynote</b>	Paulo Portas, Former Vice-Prime Minister and Former Minister of State and Foreign Affairs, Portugal
<b>Attendees</b>	Global Tax Directors of MNCs by personal invitation only
<b>Concept</b>	Interactive panel discussions based on real case scenarios from various industries and countries
<b>Location</b>	MYRIAD by Sana Hotel Conference Center Lisbon, Portugal
<b>Host</b>	Vieira de Almeida (VdA), exclusive member of WTS Global, Portugal
<b>Fees</b>	Free of charge
<b>Registration &amp; Hotel Booking</b>	<a href="https://wts.com/TDM">wts.com/TDM</a>

## The Program

The business world and the fiscal landscape are changing at an unseen pace. Governments across the globe are announcing fiscal measures and new concepts faster than ever. International institutions such as the OECD, United Nations, as well as the EU Commission and the G20 are imposing guidelines and hard laws on their respective member states in order to do away with harmful tax competition and overly aggressive tax planning.

It is in this volatile, uncertain, complex and ambiguous world that senior tax leaders need to re-align their tax strategy and tax governance to the overall business strategy of their company. During our two-day conference, we will debate those latest developments assessing the impact on existing operational business models (for new and old industries), to finally give an insight on the tax governance of the future.

Each panel on **day one** will begin with an introductory statement from a global opinion leader followed by moderated discussions with selected panelists and the participating global Tax Executives. We shall conclude the Wednesday evening with a cocktail reception at our host's premises followed by a guided tour and dinner at the stunning Tejo Power Station.

**Day two** of the program will give you the opportunity to spend the morning in **1:1 meetings** privately with our senior tax partners from over 60 countries discussing your company specific tax challenges. The afternoon will include an invitation for parallel roundtable discussions on **Africa, Asia and Latin America**, getting the latest tax insights on those emerging regions.

Thursday evening will be closed with a cocktail and dinner reception at the Hotel MYRIAD where all registered WTS Global representatives shall be in attendance.

**Dates** **Wednesday, October 9, 2019**

**Tax Directors Meeting** 10.00 – 17.30 at **Hotel MYRIAD Conference Centre**  
+ reception at the office building of Vieira de Almeida (VdA) followed by a guided tour and dinner at the Tejo Power station

**Thursday, October 10, 2019**

**Morning:** 1:1 meetings with senior tax partners of WTS Global of your choice from 60 countries

**Afternoon:** Regional roundtable sessions covering Africa, Asia and Latin America

**Evening:** Cocktail reception and meet WTS Global members from more countries at Hotel MYRIAD

**Hotel** **MYRIAD by SANA Hotel**

A room contingent for accommodation is reserved for you until **mid August**. Please make your booking until mid August to secure the special rate.

**Find all information on [wts.com/TDM](https://wts.com/TDM)**

## Program | Wednesday, October 9, 2019

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09.30 - 10.00 | **Registration & Welcome Coffee**

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10.00 - 10.15

### **Welcome & Introduction**

Wim Wuyts, CEO, WTS Global

10.15 - 11.00

### **Impact of current trade war on Europe and rest of the world**

Keynote speech: Paulo Portas, Former Vice-Prime Minister and Former Minister of State and Foreign Affairs, Portugal

11.00 - 12.30

### **In search of purpose and substance - Current struggles of tax practitioners**

- » Impact of anti-abuse rules on group structures
- » Intermediary holdings
- » Substance requirements
- » Beneficial ownership
- » CFC

**Moderator:** Roelof Gerritsen, Founding Partner, Atlas (The Netherlands)

**Panelists:** Fernando Araújo, Executive Board Member, Navigator Company

Thomas Eisgruber, International Taxation, Ministry of Finance

Sandra Hogeveen, VP Tax, Ahold Delhaize

Stefan Hölzemann, Partner, WTS (Germany)

Tiago Marreiros Moreira, Group Tax Partner, Vieira de Almeida (Portugal)

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12.30 - 14.00 | **Lunch**

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14.00 - 15.30

### **BEPS 2.0 and VAT challenges of data-driven business models**

- » Significant economic presence as new taxable nexus
- » Arm's length principle vs. formulary apportionment
- » The value of data and user participation
- » Use and Enjoyment as "virtual fixed establishment"?
- » The value of data and user participation (data as currency)
- » User base taxable nexus – The Indirect Tax take
- » BEPS 2.0 – EU VAT Consequences

**Keynote:** Achim Pross, Head of International Cooperation, OECD

**Panelists:** Axel Nientimp, Partner, WTS (Germany), Johan Visser, Director, Atlas, (The Netherlands)

Gorka Echevarría, Global VAT Leader, Lexmark

Christian Kaeser, Global Head of Tax, Siemens

Raquel Saraiva, Global Head of Direct Tax, Maersk

Sam Sim, Head TP Asia Pacific, WTS Global (Singapore)

15.30 - 16.00 | **Coffee break**

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16.00 - 17.30

## **How companies deal with DAC6 compliance in day-to-day business**

- » Update on developments of DAC6 in the EU
- » 'War story' - Experiences from Poland
- » How to implement a DAC6 compliance process throughout MNCs

**Moderator:** Gabriele Rautenstrauch, Partner, WTS (Germany)

**Panelists:** Florent Gardes, Group Tax Director, Veolia  
Magdalena Saja, Managing Partner, WTS&Saja (Poland)

17.30 Closing Remarks

18.30 Departure Hotel MYRIAD by SANA

19.00 Reception at the premises of Vieira de Almeida (VdA)

20.30 Guided tour and Dinner Reception at the Tejo Power Station

## **Program | Thursday, October 10, 2019**

09.00 - 15.00

### **1:1 Meetings with WTS Global tax advisors from countries of your choice**

Upon registration, please indicate which countries you would like to meet.

15.00 - 17.00

**Brief panel discussion: "Connecting the tax world on all continents"  
followed by parallel regional workshops on Africa, Asia and Latin America**

19.00 - 23.00

**Cocktail and dinner reception at Hotel MYRIAD by SANA**



**We are looking forward to welcoming you in Lisbon!  
Watch the teaser clip to get a flavor!**

**Register now at [wts.com/TDM](https://wts.com/TDM)**

**In case of any queries, please contact:**

Marie Christin Shenouda  
T: +49 89 28646-1929  
[tdm@wts.com](mailto:tdm@wts.com)