



CONFEDERATION
FISCALE
EUROPEENNE

CFE • 188A, Av. de Tervuren • B – 1150 Brussels

To the
Member Organisations and Observers of the CFE
Delegates of the General Assembly of the CFE
Delegates of the Fiscal Committee of the CFE
Delegates of the Professional Affairs Committee of the CFE

CFE Office
188A, Av. de Tervuren
B – 1150 Brussels
Tel: + 32 2 761 00 91
Fax + 32 2 761 00 90
brusselloffice@cfe-eutax.org

Brussels, 10 February 2016

Cc: Members of the Executive Board of the CFE

CFE Forum 2016

Dear Sir or Madam,

We are pleased to invite you to the next **CFE Forum** which will take place on

Thursday, 21 April 2016 from 9.00 – 16.30 hrs

at **the Representation of the State of North Rhine-Westphalia to the European Union**
Rue Montoyer, 47 – B-1000 Brussels

Please find enclosed the following documents:

1. Forum programme
2. Registration form (please make additional copies, if necessary) which has to be returned to the CFE office in Brussels by email **at the latest Monday 11 April 2016**. Please indicate your **e-mail address** on the enclosed registration form so that we can send you further documents electronically. The participation fee **of 300€ (250€ for those registered in the European Register of Tax Advisers of the CFE)** has to be paid per bank transfer to the **KBC-Bank, Rond-Point R. Schuman 4, 1040 Brussels, IBAN BE83 7310 2178 0515, BIC/SWIFT KREDBEBB**. Please mention your name on the payment (unfortunately cheques will not be accepted!)
3. Hotel registration forms which should be sent **directly** to the hotel where you wish to stay
4. Map

Yours faithfully,

Uta Gayer
Head of office

P.S.: The meeting of the Professional Affairs Committee will take place on Wednesday 20 April (14.30 – 17.30). The General Assembly (13.00 – approx. 17.00) and the Fiscal Committee meeting (09.00 – 17.00) will take place on Friday 22 April. You will receive the relevant invitations under separate cover.



CFE Forum 2016

“Rebuilding international taxation: How to square the circle?”

Date: Thursday 21 April 2016

Time: 9.00 - 16.30 hrs

Venue: Representation of the State of North Rhine-Westphalia, rue Montoyer 47, B-1000 Brussels

The finalisation of the BEPS project has provided governments with materials, tools and blueprints for reapplying the basic principles of international taxation like economic substance, permanent establishment and value creation. Yet it is far from clear how this large-scale project should be implemented: how to shape the new provisions so that they are fit for purpose? How can the implementation effort be coordinated internationally and achieve its political objectives? And how can one assure that the reconstruction does not lose sight of the taxpayers who are going to be subject to this new regime.

It will be crucial for both companies and tax authorities to clearly understand the concepts, and how they interact, in order to ensure that reasonable transactions are not deemed to be abusive:

- What level of economic substance will be required and how will this be reflected in practical terms, so as to determine where the key economic activities are actually being performed?
- What is the difference, if any, between value creation and economic substance?
- How can the spirit of the law be understood and interpreted in a consistent way in a cross-border context?
- What is the relevance of contract law, legal terms and interpretation in the field of transfer pricing (e.g., comparability analysis): will the above aspects have to change?
- What are the implications for VAT?

To be able to adapt successfully, taxpayers must be clear about the new rules. Where traditional concepts are revised and tax rulings are under pressure, new ways of creating legal certainty and ensuring confidentiality must be explored.

More information on programme, registration and logistics are available on our [website](#).

For further details, please do not hesitate to contact the CFE Office in Brussels:

CFE Office
188A, Avenue de Tervuren
B-1150 Brussels
Tel: +32 2 761 00 91 - Fax: +32 2 761 00 90
brusseloffice@cfe-eutax.org - www.cfe-eutax.org





CFE Forum 2016

“Rebuilding international taxation: How to square the circle?”

Thursday 21 April 2016

Representation of the State of North Rhine-Westphalia to the EU, rue Montoyer 47, B-1000 Brussels

9.00 hrs Admission

9.30 hrs Welcome by **Henk Koller**, President of the CFE
Introduction by **Piergiorgio Valente**, Chairman of the CFE Fiscal Committee

9.45 hrs Session 1 - The EU and OECD Roadmap in Action - latest initiatives

Moderation: **Stella Raventós**, Partner, ECIJA legal, Spain

Valère Moutarlier, Director, Directorate General for Taxation and Customs, European Commission
Grace Perez-Navarro, Deputy Director, Centre for Tax Policy and Administration, OECD
Ingo van Lishaut, Deputy Director Taxation, Ministry of Finance of North Rhine-Westphalia, Germany

10.45 hrs Panel discussions

11.15 hrs Coffee break

11.45 hrs Session 2 - Economic substance - What will change?

Moderation: **Ian Young**, Chairman of the CFE Direct Tax Sub-Committee / Technical Manager International Tax, ICAEW Tax Faculty, United Kingdom

Vanessa De Saint-Blanquat, Movement of the Entreprises of France (MEDEF), France
Joachim Englisch, Professor, Institute of Tax Law, Westfälische Wilhelms-Universität Münster, Germany
Martin Zogg, Attorney at law, Swiss Holding, Switzerland (TBC)

12.45 hrs Panel discussions

13.15 hrs Lunch

14.15 hrs CFE Award ceremony: **Albert J.Rädler Medal**

14.30 hrs Session 3 - Certainty, confidentiality, transparency - What may taxpayers expect from administration?

Moderation: **Rupert Shiers** Partner, Hogan Lovells, United Kingdom

Petra Pospíšilová, Chairwoman of the CFE Indirect Tax Sub-Committee / Tax Director, ČSOB Bank, Czech Republic
Isabelle Richelle, Professor, Tax Institute of the University of Liège, Belgium
Jeroen Lammers, Manager Policy Team Fiscal Affairs, Corporate Governance and Corporate Law, Association of Dutch Businesses, VNO-NCW, The Netherlands

15.30 hrs Panel discussions

16.00 hrs Summary and concluding words by **Piergiorgio Valente**



REGISTRATION FORM

Please send back to
CFE Office (188A, Av. de Tervuren, B-1150 Brussels)

by e-mail: brusselsoffice@cfe-eutax.org

Registration form CFE Forum on 21 April 2016, 09:00 – 16:30
Representation of the State of North Rhine-Westphalia to the European Union in Brussels
Rue Montoyer 47 • B-1000 Brussels

Surname:

First name:

Professional title:

Company/Organisation:

Address:

.....

Country:

Email (important):

Tel./Fax:

I will participate in the CFE Forum on Thursday 21 April 2016, 09:00 – 16:30,
Representation of the State of North Rhine-Westphalia to the European Union,
Rue Montoyer 47 • B-1000 Brussels

€300 (€250 for those registered in the European Register of Tax Advisers of the CFE) have been paid by bank transfer to KBC-Bank, Rond-Point R. Schuman 4, B – 1040 Brussels, IBAN BE83 7310 2178 0515, BIC/SWIFT KREDBEBB.

Booking Conditions

If you wish to cancel this booking you must notify the Confédération Fiscale Européenne in writing (e-mail is sufficient). If notice of cancellation is received more than 2 days prior to the event the fee will be returned less administrative charges of € 50. After this time 100% of the fee will be withheld. You may submit at any time, in writing the name of a colleague / person(s) to attend in your place.

No liability is assumed by the CFE for changes to date, content, speaker(s) or venue. In the unlikely event that it is necessary to cancel or postpone the conference, due to unforeseen circumstances, the organisation's liability will be to refund the full participation fee. Conference fees are exempt from VAT and no VAT invoice will be issued.

Please note: Participation is only possible with a confirmation by the CFE, which will be sent to you by e-mail upon receipt of your payment.

Deadline for registration: Monday 11 April 2016

LIST OF RECOMMENDED HOTELS NEAR THE VENUE

Stanhope Hotel *****

Rue du commerce 9

1000 Brussels

Tel. +32 2 506 91 11

Email: reservations@thonhotels.be

[Website](#)

Distance to the venue: [MAP](#) (5 minutes walking distance / **400 meters**)

Leopold Hotel Brussels ****

Rue du Luxembourg 35

1050 Bruxelles

Tel. +32 2 511 18 28

Email: reservations@hotel-leopold.be

[Website](#)

Distance to the venue: [MAP](#) (3 minutes walking distance / **230 meters**)

Thon Hotel EU ****

Rue de la loi 75

1040 Brussels

Tel. +32 2 204 39 11

Email: reservations@thonhotels.be

[Website](#)

Distance to the venue: [MAP](#) (8 minutes walking distance / **600 meters**)

Martin's Brussels EU ****

Boulevard Charlemagne 80

1000 Brussels

Tel. +32 2 230 85 55

Email: banguet.mbeu@martinshotels.com

[Website](#)

Distance to the venue: [MAP](#) (17 minutes walking distance / **1,3 km**)

Atlas Hotel ***

Rue du Vieux Marché aux Grains 30

1000 Brussels

Tel. +32 2 502 60 06

Email: info@atlas.be

[Website](#)

Distance to the venue: [MAP](#) (20 minutes by metro/tram or 35 minutes walking distance / **2,3 km**)



Reservation form CFE Forum
Block code: HC&16049_001 // Block ID: 24126125
From 19.04.16 until 22.04.16

19/04

- Classic room double for 1 person at **220** EUR per room/ night
 Second person in the room at a supplement of **20** EUR per night including breakfast

20/04

- Classic room double for 1 person at **220** EUR per room/ night
 Second person in the room at a supplement of **20** EUR per night including breakfast

21/04

- Classic room double for 1 person at **200** EUR per room/ night
 Second person in the room at a supplement of **20** EUR per night including breakfast

All the above rates are included breakfast, service and VAT, as well as free access to the Fitness, Sauna and Sun bed.

City tax of 9.28 EUR/room/night is excluded

Arrival date: /04/16 (Arrival time at the hotel: **PM**)

Departure date: /04/16

Please use capital letters

(Mrs/ Mr) Name/ Surname:

Company:

Address:

Telephone:

Zip code:

Fax number:

E-mail address:

N° Thon Member:

Credit card: Visa Amex MasterCard Diners

Credit card number:

Expiry date: /

Please send this registration form before **19/03/16** to:

Reservations Department

Tel: + 32 2 7007878

Fax: + 32 2 2051525

reservations@thonhotels.be

Please note the following:

- 1) These rates are valid till **19/03/16** in the above period. After this date and outside the mentioned event, the rates will be subject to availability.
- 2) Number of rooms is limited. In case of no more availability in the requested room type, the next category will be booked automatically.
- 3) All the reservations that are not guaranteed will be cancelled at 4 PM, 3 days prior to arrival. In order to guarantee your reservation, please fill in the appropriate space for the credit card number with the expiry date.
- 4) Check in time is at 2PM If you wish to arrive before, the room must be booked and paid the night before.
- 5) The room bill will need to be settled upon check out.
- 6) Check out time is at 12.00. For a late check out, a day use will be charged.
- 7) In case of cancellation, a request must be sent to the hotel at least 3 days before the arrival date. If the hotel does not receive any cancellation letter (by fax or email) before the deadline, the entire stay will be charged on the above credit card as a late cancellation fee.
- 8) In case of no show the entire stay will be charged on the above credit card.
- 9) The above rates are only applicable with this registration form and for above dates.





**RESERVATION REQUEST FORM
LEOPOLD HOTEL**

CFE Forum

Leopold Hotel Brussels EU Luxemburgstraat 35 Rue du Luxembourg 35 B-1050 Brussels	reservations@hotel-leopold.be www.hotel-leopold.be Tel : +32 2 511 18 28 Fax: +32 2 514 19 39
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Overnight stay for April 19th, 20th & 21st 2016
Please request your booking before: March 21st 2016
You will receive a reply/confirmation by return

ARRIVAL DATE DEPARTURE DATE NIGHTS ROOM TYPE (standard single/double)
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GUEST NAME YOUR TEL NUMBER YOUR EMAIL ADDRESS YOUR COMPANY NAME
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GUARANTEE

All reservations must be guaranteed with full credit card details. All non guaranteed bookings are not valid!

NUMBER EXPIRY DATE CREDIT CARD HOLDER
---	-------------------------

RATE: valid till March 21st 2016

We made a bloc booking of 20 standard rooms for April 19th, 20th & 21st 2016

For the nights of April 19th & April 20th 2016

- at 170 Euros/single room/ night (single use)
- at 190 Euros/double/ twin room/ night (double use)

For the night of April 21st 2016

- at 150 Euros/single room/ night (single use)
- at 170 Euros/double/ twin room/ night (double use)

These rates are per room, per night, including breakfast buffet, Internet WIFI, city tax, service & VAT

CANCELLATION POLICY :

- Any cancellation should be communicated (by fax or mail) **the latest 3 working days (Saturday & Sunday are not working days) by 1pm prior to the arrival date**
- No shows and late cancellations are charged at 100 % of the total stay

SIGNATURE :

DATE :

Reservation form CFE Forum
Block code: HC&160419 // Block ID: 24124111
From 19.04.2016 until 22.04.2016

19/04

- Classic room double for 1 person at **200** EUR per room/ night
 Second person in the room at a supplement of **20** EUR per night including breakfast

20/04

- Classic room double for 1 person at **200** EUR per room/ night
 Second person in the room at a supplement of **20** EUR per night including breakfast

21/04

- Classic room double for 1 person at **160** EUR per room/ night
 Second person in the room at a supplement of **20** EUR per night including breakfast

The city tax of 7.58 EUR per room, per night is not included in the room rate.
All the above rate includes breakfast, service and VAT, as well as free access to the fitness and sauna.

Arrival date: **.04.2016** (Check in time as from: 14:00)

Departure date: **.04.2016** (Check out time before: noon)

(Mrs/ Mr) Name/ Surname:

Company:

Address:

Telephone:

Zip code:

Fax number:

E-mail address:

N° Thon Member:

Credit card: Visa

Amex

MasterCard

Diners

Credit card number:

Expiry date: /

Please send this registration form before **19.03.2016** to:

Reservations Department

Tel: + 32 2 7007878

Fax: + 32 2 2051525

reservations@thonhotels.be

Please note the following:

- 1) These rates are valid till **19.03.2016** and during the above period. After this deadline and outside the mentioned event, the negotiated rates will be subject to availability.
- 2) Number of rooms is limited. In case of no more availability for the requested room type before the deadline, the next category will be booked automatically.
- 3) All the reservations that are not guaranteed will be cancelled 3 days prior to arrival. In order to guarantee your reservation, please fill in the appropriate space for the credit card number with the expiry date.
- 4) Early check-in depends of availability. May you wish to check-in into your room before, please book and prepay the night before.
- 5) The room bill is to be settled upon check out.
- 6) In case of late check out, an extra fee will be applied immediately.
- 7) In case of cancellation, a request must be sent to the hotel at least 3 days before the arrival date. If case of no notification (by fax or email) before the deadline, the entire stay will be charged on the above credit card as a late cancellation fee.
- 8) In case of no show the entire stay will be charged on the above credit card.
- 9) The above rates are only applicable with this registration form and for above dates.

Reservation form: CFE

BlockCode: HCL190416

Details

NAME : _____

FIRSTNAME : _____

DATE OF ARRIVAL :

DATE OF DEPARTURE :

RATE:

19/04: 199euro

20/04: 209euro

21/04: 169euro

Rates per night, per single room; Including wireless internet, breakfast buffet, vat & service.

Excluding : city tax (7,15eur per room per night)

RELEASE DATE: 19/02/2016—after that date, we don't guarantee availability or rate.

Additional night : on request—price might change

Credit card Guarantee-MANDATORY

Without credit card details, the reservation will not be made!

Credit card number:

TEL:

_____ FAX: _____

MAIL: _____

Parking place: If you need one, we have a few in our inside garage—on request. (30€/perday)

Please send the document filled in **19/02/2016** (after, we don't guarantee availability or rate)

- by email: banquet.mcp@martinshotels.com
- by fax at +32 2 230 56 35

Martin's Brussels EU

Boulevard Charlemagne 80 Karel de Grotelaan, Bruxelles 1000 Brussel Phone +

3222308555 Fax +3222305635 mbeu@martinshotels.com

BELFIUSBANK 786-5615032-74 IBAN BE16-7865-6150-3274 BIC BACBBEBB

TVA BE0443093723



ATLAS HOTEL
★ ★ ★
DOWNTOWN BRUSSELS
88 ROOMS

Rue du Vieux Marché aux Grains, 30 • B-1000 Brussels
Phone : +32.2.502.60.06 • Fax : +32.2.502.69.35 • E-mail : info@atlas.be • Web : www.atlas.be

Attn : Reservations - Atlas Hotel Brussels

Fax Nr of ATLAS HOTEL : + 32 2 502 69 35

From :

Date:/...../.....

Total Pages : 1

ATLAS HOTEL BOOKING FORM

"CFE Forum 2016"

Confédération Fiscale Européenne

10 single rooms from the 19th of April 2016 for 4 nights

Dear Atlas Hotel Reservations Department,

I would like to submit my following reservation request and receive your confirmation back
by email fax.

Guest Name: Mr / Mrs

Arrival Date:April 2016 **Departure Date:**April 2016 **Nr of night:**

Nr of room and type: SINGLE / DOUBLE / TWIN

At the Preferred Rate of 130 €/SGL/night or 150 €/DBL/TWN/night from Monday to Thursday night
and the Preferred Rate of 85 €/SGL/night or 99 €/DBL/TWN/night from Friday to Sunday night
Buffet breakfast, all taxes & service charges all included.

ARRIVAL TIME:

Guest's **email address:**@.....

Guest's phone or mobile **phone number:** +.....

Guest's **address:**

.....

Credit card number*: **Exp date:** /

**the credit card details guarantee the booking/ payment will be done upon departure*

Please confirm this reservation by email (info@atlas.be) or fax (+32.2.502.69.35) before **the 26th of February 2016.**

Cancellation policy: at least before 4 pm 2 days before arrival date by written (fax or mail) to avoid the charge of the total stay.
The hotel is then entitled to charge on my credit card (in case of late cancellation or no-show).

Signature for agreement: