

**The Chartered Institute of Taxation
and
the Dutch Association of Tax Advisers
organise the:
European Branch Amsterdam Conference 2017**

Date: 25 September 2017

12.45 - 13.10 hrs. Registration and coffee

13.10 – 13.15 hrs. **Welcome from Anne Fairpo**
(Chair CIOT, European Branch)

13.15 – 14.45 hrs. **Treaty abuse in the UK and the Netherlands**

- MLI
- ATAD/GAAR
- Recent cases European case law

Moderator:

Aart Nolten *(President Section international Fiscal Affairs NOB and Deloitte)*

Speakers:

Sjoerd Douma
(Lubbers, Boer & Douma and Professor at Leiden University)
Barry Larking *(Independent consultant)*

14.45 - 15.00 hrs. Coffee break

15.00 - 16.30 hrs. **Transfer Pricing: recent trends in the UK and the Netherlands**
Recent experiences with tax authorities in both countries

- Advanced pricing agreements
- Multilateral agreement procedures
- Information exchange
- Tax adjustment rules
- Profit Split
- OECD action plan 8-10

Speakers:

Hans van Egdorn
(senior Transfer Pricing specialist at the Ministry of Finance)
Peter Steeds *(KPMG)*



16.30 - 17.00 hrs. Coffee break

17.00 - 18.30 hrs. **Implementation of ATAD**

- GAAR
- CFC
- Limited interest deduction
- Anti-avoidance rules

Speakers:

Gijs Fibbe (*Baker Tilly Berk and the Erasmus University Rotterdam*)

Bart Le Blanc (*Norton Rose Fulbright*)

Andrew Roycroft (*Norton Rose Fulbright*)

18.30 - 18.45 hrs. **Concluding remarks**

18.45 hrs. Cocktails

Soort bijeenkomst: Vaktechnisch
Aantal PE-uren: 4,5

Venue: IBFD, Rietlandpark 301, 1019 DW Amsterdam. The Netherlands, Tel: +31-20-554 0100