

TRAVELLING LECTURESHIP PROGRAMME 2024

TOPIC: DISPUTE RESOLUTION

28 FEBRUARY – 20 JUNE 2024

- 5 regions
- 6 travelling lecturers
- panel discussion
- networking





Steady growth of cross-border investment, mobility and global tax reforms suggest a critical need for improved international tax dispute avoidance and resolution mechanisms. We will address the subject from a holistic perspective with an emphasis on practical and strategic considerations, based on a review of existing mechanisms, the alternatives to domestic tax litigation, legal certainty, and efficiency considerations. The events will include a global lecturer and a panel discussion with corporate tax directors, practitioners, government officials and academics.

Prof. Guglielmo Maisto, The President of Global IFA

Prof. Robert Danon, The Chair of Global IFA's Permanent Scientific Committee

STRUCTURE OF THE LECTURES



Travelling lecturer's presentation on:

- Objectives of BEPS Action 14 and global standards on dispute resolution, including Peer Review Mechanism
- Scope of the MAP (including as the case may be tax treaty arbitration): what is inside and outside the MAP
- Access/denial of MAP requests
- Judicial review in relation to the denial of access to MAP and information access
- Possible improvements to the OECD Commentary on Art. 25 to better align the practice to the objectives of BEPS Action 14

Panel discussion

Includes the representatives of Country Tax Administration, Business, and Academia

- Tax treaty dispute resolution policy and practice and standards laid down by BEPS Action 14 in the country where the lecture takes place;
- Perspective and experience with tax treaty arbitration;
- Current experiences: (i) increase or decrease of MAP cases/country(ies) with the most important number of MAP cases, (ii) experiences with developing countries;
- Challenges raised by capacity building;
- Country's perspective on the handling of P2 disputes.
- Perspective of businesses on the above inputs.

Q&A with the floor

Concluding remarks by the lecturer



PARIS, FRANCE

27 FEBRUARY,
TUESDAY



 **ICC Headquarters**

33-43 avenue du Président Wilson, 75116 Paris, France

Language: French, English

Lecturer: Bruno Gibert (France)

Panelists:

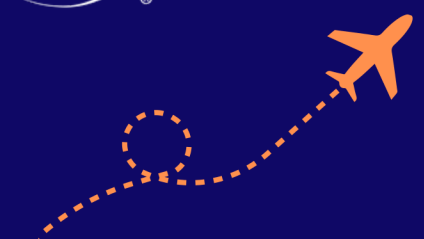
Inga Kondrataite (TEI)

Alfred de Lassence (ICC)

Achim Pross (OECD)

Stéphanie Prudent (IFA France)

Alexia Scott (IFA France)



LONDON, UK
28 FEBRUARY,
WEDNESDAY

📍 **Slaughter & May**
One Bunhill Row, London EC1Y 8YY

Language: English

Lecturer: Bruno Gibert (France)

Panelists:

Sarah Blakelock (IFA UK)

Catherine Harlow (ICC)

John Connors (ICC)

**MADRID,
SPAIN**

15 APRIL, MONDAY

 **Madrid Bar Association (Calle de Serrano, 9)**

Language: English

Lecturer: Bruno Gibert (France)

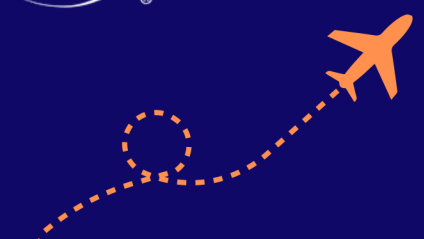
Panelists:

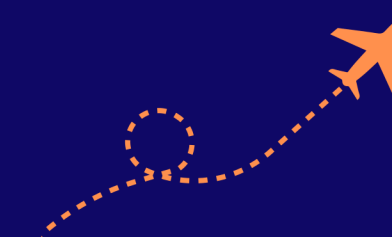
Dr. Lluís M. Fargas (Arxada, Vice President - Global Head of Tax; TEI)

Rocío Bermúdez (Repsol, Vice-chair of the Global Tax Commission; ICC)

Ms. Ascensión Maldonado (Head of the International Tax Office (ONFI), AEAT)

Roberta Poza (Deloitte, IFA Spain)





**MONTREAL,
CANADA**
5 MARCH, TUESDAY



EY

900 Boulevard de Maisonneuve Ouest, Bureau 2300

Language: English

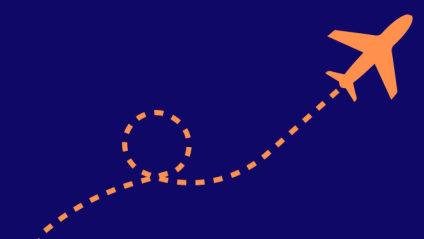
Lecturer: Caroline Silberztein (France)

Panelists:

Jennifer Paul (Canada Revenue Agency)

Sébastien Rheault (IFA Canada, Barsalou Lawson Rheault LLP)

Josephine L. Scalia (TEI)



WASHINGTON DC, USA
7 MARCH, THURSDAY



 **Baker & McKenzie LLP**
815 Connecticut Ave., N.W.

Language: English

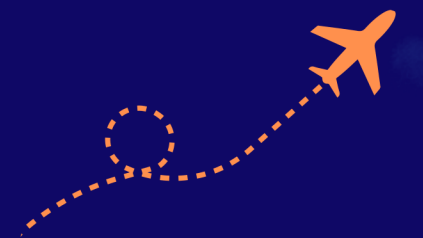
Lecturer: Angelo Nikolakakis (Canada)

Panelists:

Alan Granwell (Holland & Knight)

Brian Kaufman (TEI, Capital One)

Nicole Welch (Internal Revenue Service)



**SÃO PAULO,
BRAZIL**

22 APRIL, MONDAY



17:00-20:00

Anne Frank Theater | Hebraica Club – SP
R. Hungria, 1000 - Pinheiros

Language: English

Lecturer: Adolfo Martin Jimenez

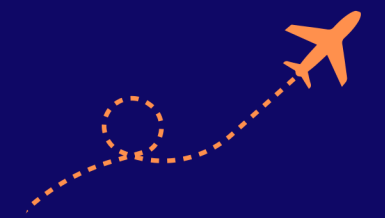
Panelists:

Luis Eduardo Schoueri (Vice-President of IFA Brazil/ABDF; Full Professor of Tax Law at USP Law School)

Anelize de Almeida (IRS, National Treasury's Attorney General)

Rogério Araújo (Tetra Pak, Head of Taxes; TEI)

Lionel Bonner Nobre (Dell Technologies, Vice-President, Latin America Tax)



**LIMA,
PERU**

**24 APRIL,
WEDNESDAY**



EY

Av. Víctor A. Belaúnde 171, San Isidro 15073

Language: English

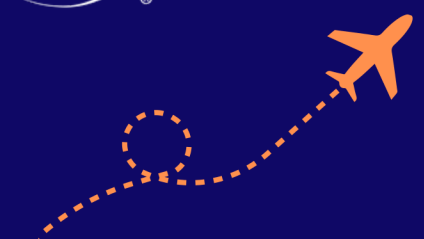
Lecturer: Adolfo Martin Jimenez (Spain)

Panelists:

Mr. Fernando Becerra (Tax Administration, in charge of International Taxation and Transfer Pricing)

Ms. Gabriela Haro (PwC, Tax Director)

Mr. Lionel Bonner Nobre (Dell Technologies, Vice-President, Latin America Tax)



**JAKARTA,
INDONESIA**

13 MAY, MONDAY



On Five
Grand Hyatt Hotel 5th Floor
Jl. MH Thamrin Kav. 28-30
Jakarta 10350

Language: English

Lecturer: Porus Kaka (Honorary President IFA, Senior Advocate (India) & Barrister (England & Wales) and Trustee (IBFD))

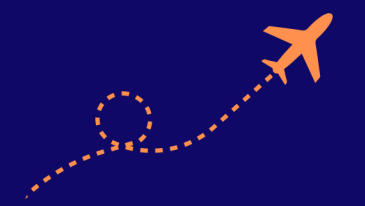
Opening of scientific agenda: Prof Robert Danon (Chair Global IFA PSC)

Panelists:

DR. Mekar Satria Utama, SE., MP, Acc. (Director of International Taxation – the Director General of Taxes)

Patrick Connolly (TEI Asia President)

Permana Adi Saputra (IFA Indonesia Secretary General)



SINGAPORE

14 MAY, TUESDAY

📍 **Marina One West Tower, The Auditorium (Level 3)**
9 Straits View, Singapore 018936

Language: English

Lecturer: Porus Kaka (Honorary President (IFA), Senior Advocate (India) & Barrister (England & Wales) and Trustee (IBFD))

Opening of scientific agenda: Prof Robert Danon (Chair Global IFA PSC)

Panelists:

Ng Pei San (Tax Director of the Inland Revenue Authority of Singapore)

Patrick Connolly (TEI Asia President)

Sam Sim (Tax Analysts, Board Member)

Luis Coronado (EY, Global Head of Tax Controversy; IFA Singapore)



**LAGOS,
NIGERIA**

JUNE 3, MONDAY



MTN

MTN Plaza, No 1, Awolowo Road, Falomo Ikoyi, Lagos

Language: English

Lecturer: Lutando Mvovo (South Africa)

Panelists:

Zacc Adedeji (Executive Chair of FIRS)

Dapo Ladimeji (IFA Africa Region, Chair)

**MEXICO CITY,
MEXICO**



Club the Industriales

18 JUNE, TUESDAY

Lecturer: Adolfo Martin Jimenez (Spain)

Panelists:

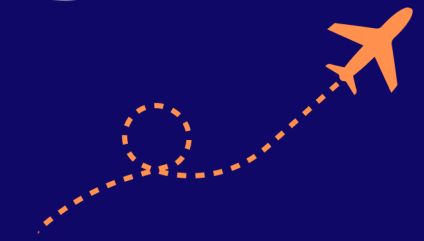
Carlos González Gamero (Tax Administration Service - SAT)

Itai Grinberg (Georgetown University, Professor of Law)

Alejandro Machorro (Mercado Libre Mexico, Head of Tax; ICC)

Ricardo Rendón (Chevez Ruiz Zamarripa, Partner)

Sergio Ruelas (Marsh McLennan, Tax Director; TEI)



**BOGOTA,
COLOMBIA**

20 JUNE, THURSDAY

Cámara de Comercio de Bogotá- Sede Chapinero
📍 Calle 67 No. 8-32 Auditorio

Language: Spanish

Lecturer: Adolfo Martin Jimenez (Spain)

Opening words: Natalia Quiñones (Global IFA Vice President), Laura Sanint (IFA Colombia President)

Panelists:

Aura Hernandez (Marsh McLennan, Assistant Director - Tax Advisory; TEI)

Catalina Hoyos Jimenez (Godoy & Hoyos Abogados, Partner; IFA Colombia)

Gustavo Piedrahita (ICC Colombia)

Lorenzo Uribe (Ministry of Finance)

