

PROGRAMME

PUBLIC CONSULTATION ON TRANSFER PRICING MATTERS

6-7 JULY 2015

**OECD CONFERENCE CENTRE
2 RUE ANDRÉ PASCAL 75016 PARIS, FRANCE**

MONDAY 6 JULY 2015	
08:30 - 09:45	REGISTRATION
10:00 - 10:15	OPENING REMARKS AND GROUND RULES
	<p><i>Speakers:</i></p> <p>Michelle Levac, Chair of Working Party No. 6 William Morris, BIAC</p>
10:15 - 11:30	I. DISCUSSION DRAFT ON REVISIONS TO CHAPTER VIII OF THE TRANSFER PRICING GUIDELINES – COST CONTRIBUTION ARRANGEMENTS – PARTICIPATION IN A COST CONTRIBUTION ARRANGEMENT
	<p><i>Status of OECD Consideration - Peter Klaver, Delegate for the Netherlands</i></p> <p><i>Speakers:</i></p> <p><i>Kirsty Gaston, AstraZeneca; Catie Magelssen, BIAC; Danny Houben, IOGP</i></p> <p>1. Features of similar arrangements between third parties</p> <p><i>Sol Picciotto, BEPS Monitoring Group; Ronald van den Brekel, EY; Gary D. Sprague, Software Coalition; Philippe Paumier, Sanofi</i></p> <p>2. Qualification of a participant: decision-making over its risk, how outcomes benefit its business, functions/capabilities in addition to funding</p> <p><i>Open Discussion</i></p>
11:30- 12:00	Refreshment Break
12:00 - 13:15	II. DISCUSSION DRAFT ON REVISIONS TO CHAPTER VIII OF THE TRANSFER PRICING GUIDELINES – COST CONTRIBUTION ARRANGEMENTS – MEASURING CONTRIBUTIONS
	<p><i>Status of OECD Consideration - Mike McDonald, Co-Chair of Working Party No. 6</i></p> <p><i>Speakers:</i></p> <p><i>Philippe Penelle, Deloitte US; Patrick Breslin, NERA; Caroline Silberztein, IAPT; Rob Johnson, SVTDG</i></p> <p>1. Valuing contributions of pre-existing value vs current performance of CCA activities</p> <p><i>Giles Parsons, TEI; Catherine Harlow, EBIT; Chris Faiferlick, USCIB</i></p> <p>2. Periodic adjustments and balancing payments – when, how and how much?</p> <p><i>Open Discussion</i></p>
13:15 - 14:30	Lunch break

14:30 - 15:45	III. DISCUSSION DRAFT ON REVISIONS TO CHAPTER VI OF THE TRANSFER PRICING GUIDELINES - HARD-TO-VALUE INTANGIBLES
	<p><i>Status of OECD Consideration - Blair Vokey, Delegate for Canada</i></p> <p>Speakers:</p> <p><i>John Henshall, Deloitte UK; Harmen van Dam, Loyens & Loeff; Clark Chandler, KPMG</i></p> <p>Scope, thresholds, and ex post evidence</p> <p>Open Discussion</p>
15:45 - 16:15	Refreshment Break
16:15 - 17:30	IV. DISCUSSION DRAFT ON REVISIONS TO CHAPTER VI OF THE TRANSFER PRICING GUIDELINES - HARD-TO-VALUE INTANGIBLES
	<p><i>Status of OECD Consideration - Franz Tomasek, Co-Chair of Working Party No. 6</i></p> <p>Speakers:</p> <p><i>Tim Woodhorpe, GSK; Mark Bronson, Duff & Phelps; Catherine Schultz, NFTC; Isabel Verlinden, PwC; Carol A. Dunahoo, TPWG</i></p> <p>Exemptions, safeguards, and implementation</p> <p>Open Discussion</p>
TUESDAY 7 JULY 2015	
10:00 - 11:15	V. STATUS OF REVISIONS TO CHAPTER I AND CHAPTER VI OF THE TRANSFER PRICING GUIDELINES
	<p><i>Presentation - Marlies de Ruiter and Andrew Hickman (OECD Secretariat)</i></p> <p>Open Discussion</p>
11:15 - 11:45	Refreshment Break
11:45 - 12:45	VI. STATUS OF REVISIONS TO CHAPTER I AND CHAPTER VI OF THE TRANSFER PRICING GUIDELINES
	<p><i>Presentation - Marlies de Ruiter and Andrew Hickman (OECD Secretariat)</i></p> <p>Open Discussion</p>
12:45 - 13:00	CONCLUDING REMARKS
	<p>Speaker:</p> <p><i>Michelle Levac, Chair of Working Party No. 6</i></p>
13:00	ADJOURN