

# FORUM ON TAX ADMINISTRATION

## TAX CERTAINTY DAY

14 November 2023

Virtual meeting

Agenda

### Tuesday 14 November 2023 (13h00 – 17h30)

13h00 – 13h15

#### Item 1. Welcome and introduction to the meeting

Opening remarks, aims of the meeting and housekeeping items.

- **Manal Corwin**, Director, Centre for Tax Policy and Administration, OECD
- **Alan McLean**, Chair, Business at OECD Tax Committee

13h15– 13h45

#### Item 2. Introduction and release of the 2022 MAP Statistics and the 2023 Consolidated Information on MAP

The Secretariat will present the 2022 MAP statistics, key messages, and introduce the OECD Consolidated Information on MAP on the occasion of its first publication

Moderator:

- **Achim Pross**, Deputy-Director, Centre for Tax Policy and Administration, OECD

Speakers:

- **Sandra Knaepen**, Acting Head of the Tax Administration and VAT Division and Co-Head of Tax Certainty Unit, OECD
- **Pierre-Louis Chenu**, Tax Certainty Unit, OECD
- **John Hughes**, Chair, FTA MAP Forum
- **Alan McLean**, Chair, Business at OECD Tax Committee

13h45– 14h45

#### Item 3. Tax Certainty under Pillar One and Pillar Two

This session will focus on the Tax Certainty aspects of Pillar One and Pillar Two as described in the draft MLC and the relevant public Consultation Documents

Moderator:

- **Achim Pross**, Deputy-Director, Centre for Tax Policy and Administration, OECD

Speakers:

- **Sriram Govind**, Advisor, Tax Certainty Unit, OECD
- **Félicie Bonnet**, Acting Head of the Aggressive Tax Planning Unit, OECD
- **Timothy Power**, Deputy Director of Corporate Tax, HM Treasury UK
- **Oki Yasui**, Director (Digital Economy), National Tax Agency Japan
- **Maidah Kayekesi**, Assistant Inspector, Zambia Revenue Authority

- **Marco Iuvinale**, Director of European and International tax affairs, Italian Ministry of Economy and Finance & Chair, Working Party 11
- **Jason Wiegand**, Senior Director - North America Tax at Procter & Gamble
- **Thomas Quatrevalet**, Deputy Group Head of Tax, Air Liquide

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*14h45-15h00 Break*

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15h00-15h40

#### **Item 4. International Compliance Assurance Programme (ICAP) – Outcomes for MNEs**

This session will present initial aggregated and anonymised results from the risk assessments completed in ICAP to October 2023, including the time taken for each stage of a review and the risk assessment outcomes provided to MNEs, and will consider improvements that could be made to the programme.

Moderator:

- **Mark Johnson**, Co-Head of Tax Certainty Unit, OECD

Speakers:

- **Nicole Casey**, Advisor, Tax Certainty Unit, OECD
- **Jennifer Best**, Deputy Commissioner, Large Business and International Division, United States Internal Revenue Service (IRS)
- **Michael Dyer**, Director of Global Tax, Steelcase
- **Martin Wenke**, Head of Transfer Pricing (Group Tax), Merck
- **Laurence Brochet**, Vice-Chair, Business at OECD Tax Committee

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15h40-16h50

#### **Item 5. Tax Certainty around the world**

This session will focus on the current landscape of the Tax Certainty agenda and will explore whether there is a need to improve the tools that are currently in use.

Moderator:

- **Sandra Knaepen**, Acting Head of the Tax Administration and VAT Division and Co-Head of Tax Certainty Unit, OECD

Speakers:

- **Andrea Medina**, Head of International tax audit unit for large taxpayers, DIAN Colombia
- **Nicole Welch**, Director, Treaty and Transfer Pricing Operations Practice Area, US Internal Revenue Service
- **Harm Mark Pit**, Process coordinator MAP&APA, Belastingdienst (Dutch Tax Administration) & Vice-Chair, FTA MAP Forum
- **Maidah Kayekesi**, Assistant Inspector, Zambia Revenue Authority
- **Takahiro Hitakatsu**, Director, Office of Mutual Agreement Procedures, National Tax Agency Japan
- **Michael Lennard**, Chief of International Tax Cooperation and Trade, United Nations
- **Gianmarco Cottani**, Head of Tax, Agoda
- **Martin O'Rourke**, Director, Transfer Pricing, PwC

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16h50 – 17h20

**Item 6. MAP Awards**

Announcement and presentation of the MAP Awards.

- **Bob Hamilton**, Commissioner, Canada Revenue Agency & FTA Chair

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17h20 – 17h30

**Item 7. Closing Remarks**

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