



**PKF International Tax Conference
Madrid, Spain**

**Wednesday 10th to Saturday 13th November
2010**

DRAFT PROGRAMME

Theme: Moving Beyond the Crisis

Day 1, Wednesday 10th – Conference Breakouts

Specialist pre conference sessions Any partners who are practising in these areas or are looking to develop a specialisation are encouraged to attend.

Day and Time	Choice of Sessions		
Wednesday 12.15pm to 1.00p m	Light Lunch		
Wednesday 1.00pm to 6.00pm (with break for afternoon tea at 3.30pm)	International Employment Tax Pre Conference Session <ul style="list-style-type: none"> • Business Development initiatives • Cross border referrals • Update on key issues Facilitators: Kumar Krishnasamy PKF Melbourne Committee Organiser: Chairman	Transfer Pricing Pre Conference Session <ul style="list-style-type: none"> • Business Development initiatives • Cross border referrals • Update on key issues Facilitators: Rafael Carsalade, PKF Texas Committee Organiser: Kevin	VAT Pre Conference Session <ul style="list-style-type: none"> • Business Development initiatives • Cross border referrals • Update on key issues [Note – VAT Specialists will also be meeting on Friday as separate break-out] Facilitators: Billy Cairns and Sarah Halsted PKF UK Committee Organiser: Ian

Day 1, Wednesday 10th –Cocktail Reception

Day and Time	Topic	
Wednesday 7:00pm	Welcome cocktail reception at hotel for attendees and accompanying spouses followed by a Welcome Dinner.	Welcome Address by: Chairman, PKF International Tax Committee

Day 2, Thursday 11 th – Morning		
Day and Time	Topic	
Thursday 9:00am – 9:15am	Welcome Introduction to Madrid	Felix Pedrosa, Barcelona, Spain Organiser : Oliver
9:15am – 10:15am	Guest Speaker : Economic Focus	tba Committee Organiser : Dirk
10.15am – 10.45am	PKF International Update An update from the chairman of the PKF International Board in relation to important developments for PKF offices	Wolfgang Hoffman Chairman PKF International Board Committee Organiser : Chairman
10:45am – 11:15am	Morning Tea	
11.15am – 12.15pm	Moving Beyond the Crisis As governments around the world face increasing budget deficits there is renewed focus on strong administration of tax policy. During the last year the G8 and G20 have given strong political support to the OECD's work to counter offshore non-compliance, which has led to an almost universal endorsement of the transparency and exchange of information as well as a closer cooperation between financial intelligence units, other law enforcement agencies and tax authorities can leading to more effective action against money laundering, financing terrorism and bribery. This session will provide an overview of a pre-conference survey of the key measures undertaken by Governments around the globe	Panel Facilitator: Panel Discussion Germany : Peter Plugfelder, Duisburg UK : John Cassidy, London USA: Tom Murtagh, Wolf and Company, Chicago Committee Organiser: Frenk
12:15pm – 1:00pm	USA Update Update on key changes of the Obama administration impacting on foreign investment into the US	John Forry, Eisner LLP, New York Committee Organiser : Kevin
1.00pm to 2.00pm	Lunch	
Day 2, Thursday 11 th - Afternoon		
Day and Time	Topic	
2.00pm – 6.00pm	Tour of Madrid	
6.00pm – 7.00pm	Free Time	
7.00pm	Dinner	

Day 3, Friday 12th - Morning

Day and Time	Topic	
Friday 9:00am – 9.45am	Update – Specialist Focus Areas This session will bring the audience up to date on key initiatives from our specialist areas including <ul style="list-style-type: none"> • International Employment Taxes • Transfer Pricing • VAT 	Presenters Kumar Krishnasamy PKF Melbourne Rafael Carsalade PKF Texas Billy Cairns and Sarah Halsted PKF UK Committee Organisers : Chairman
9.45am-10.45am	EU Update <ul style="list-style-type: none"> • Important decisions of the European Court of Justice [VAT Specialists breakout session runs concurrently for remainder of the day – Billy and Sarah to co-ordinate]	Frenk van Vliet, Netherlands Committee Organiser : Frenk
10:45am – 11:15am	Morning Tea	
11:00am – 12:15pm	Taxation of gains on securities derived by non residents. Hal Adrion will present the findings of a survey he conducted detailing the tax implications of the sale of marketable securities by non-residents in over 25 countries. There are an increasing number of countries that tax non residents on the disposition of securities where tax treaty protection is denied. This has become a huge issue for both private equity and hedge funds. Fin 48 issues will also be covered from a U.S perspective	Hal Adrion Eisner, New York Panel Discussion Spain : tba Canada : Bill Macaulay, Smith Ratcliffe , Vancouver Germany: Matthias Muller, Hamburg Australia: Paul Lyon, Sydney Committee Organiser : Kevin
12.15pm – 1.00pm	Business Development Update An update from the Business Development Directors in relation to important developments in Asia, North America, and Europe	Job Dieleman, USA Oliver Grosse-Brauckmann, Europe Committee Organiser : Chairman
1:00pm – 2.00pm	Lunch	

Day 3, Friday 12th - Afternoon

Day and Time	Topic	Speakers
2.00pm – 3.30pm	<p>Key Tax Treaty Issues for Inbound Investment</p> <p>This session will focus on the key matters for PKF member firms relevant to servicing foreign subsidiary companies (both inward and outward) beating the problems and pitfalls including a focus on</p> <ul style="list-style-type: none"> • corporate tax residency • central management and control • permanent establishment 	<p>Panel Facilitators: Paul Lyon and Chris Freckmann, PKF Sydney</p> <p>Panel Discussion</p> <p>UK : Katherine Brown, London</p> <p>USA: Sue Tuson, Clayton & McKerverey</p> <p>Europe : Peter Plugfelder, Duisburg</p> <p>Brazil : tba</p> <p>Singapore : Roy Lim</p> <p>Committee Organiser : Eugene</p>
3.30pm to 4.00 pm	Afternoon Tea	
4.00pm to 5.30 pm	<p>Tax Incentives</p> <p>Many government's offer both short and long term tax incentives to attract foreign capital to their country. This session will provide an overview of the key incentives across different regions</p> <p>Note - Presenters will need to select a number of countries in their own region and provide a comparison</p>	<p>Panel Facilitator:</p> <p>Panel Discussion</p> <p>Asia : Roy Lim, Singapore</p> <p>Europe : Anca Mataragiu, Romania</p> <p>South America : Gustavo Director, Buenos Aires</p> <p>Africa: Paul Gering, Durban</p> <p>Committee Organiser : Dirk</p>
5.30pm – 7.00pm	CONFERENCE CLOSE & Free Time	
7.00pm	GALA DINNER	

Day 4, Saturday 13th

Day and Time	Topic
Saturday	DELEGATES DISBURSE / FREE TIME