

19th Annual Tax Policy & Practice Symposium



Disruption and opportunity in the era of global tax transformation

Washington, DC
February 15–16, 2018

Program manager

Deloitte.

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December 7, 2017

Dear Colleague,

The Tax Council Policy Institute (TCPI) invites you to participate in our 19th Annual Tax Policy & Practice Symposium, **"Disruption and opportunity in the era of global tax transformation,"** to be held February 15-16, 2018 at The Ritz-Carlton in Washington, DC.

Be part of a focused, hands-on, educational assembly of more than 40 presenters—tax leaders from business, government, and academia—for a unique, two-day Symposium. Together we'll examine emerging policy considerations, share insights, and exchange practical strategies for managing and mitigating the disruptions and opportunities that changes in tax policy create.

The 2018 Symposium will explore how tax executives are anticipating and responding to the transformation taking place in tax globally. We'll discuss a range of issues critical to managing the rapidly changing tax landscape, including:

- The C-suite perception of tax disruption and its short- and mid-term impact on key decisions and operations
- The state of US tax reform, including an exploration of how it may change future tax and business decisions for domestic and global enterprises
- Global tax legislative and enforcement trends and predictions, including the upheaval stemming from OECD, EU, and G20 actions and proposals
- Strategies and tools to meet these challenges within an evolving tax workplace

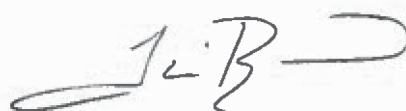
TCPI is a highly respected non-profit and non-partisan public policy research and educational organization that has been sponsoring compelling tax programs and conferences for more than 18 years. Our symposia are renowned for facilitating leading tax professionals and policy makers from government, academia, and business in the exploration of all aspects of current tax topics.

Join your tax leader peers from around the world to discuss and debate how current, proposed, and potential changes may impact your tax planning, practices, and structures today and in the future. On behalf of TCPI and the program manager for this year's Symposium, Deloitte Tax LLP, we look forward to seeing you in February.

Sincerely,



Lynda K. Walker, Esq.
TCPI Executive Director and General Counsel



Tim C. Raymond
Chairman, TCPI Board of Directors

TCPI 2018 Planning Committee

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2018 Symposium Faculty

Speakers are still being finalized for the program. The list will be updated periodically on the TCPI website at www.tcpi.org

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Martin Sullivan

Chief Economist
Tax Analysts

Russell Sullivan

Partner
McGuireWoods

Patricia Sweeney

Member
Miller & Chevalier Chartered

Symposium agenda

February 15, 2018

7:00 a.m.–8:00 a.m.

Registration and breakfast

8:00 a.m.–8:20 a.m.

Welcome and introductions

8:20 a.m.–9:00 a.m.

Keynote address

9:00 a.m.–10:00 a.m.

Planning amid the chaos: The C-suite's perspective

Tax outcomes and risks have always been key considerations in business decision making. However, the current state of global tax uncertainty, coupled with the pace of disruption, makes it increasingly important to understand and anticipate the potential tax impact of strategic business decisions. In this panel, we will explore how the C-suite is teaming with tax to:

- Report the impact of tax uncertainty to the CEO and board
- Redefine how tax is factored into key capital allocation decisions
- Translate organization-wide and marketplace demands into tax priorities

10:00 a.m.–10:30 a.m.

Break

10:30 a.m.–11:30 a.m.

Tax disruption: Changes in the global legal landscape

Tax authorities worldwide have been examining and adjusting their regimes to achieve base broadening while responding to shifts in the global business environment that are challenging traditional international tax norms. This panel will explore:

- The most significant recent changes
- Changes on the horizon—including OECD-, EU-, and jurisdiction-led initiatives
- The impact of these developments on businesses

11:30 a.m.–12:30 p.m.

Tax disruption: Global examination and enforcement risk

While tax lawmakers and regulators have been focusing on changing the rules that govern taxation, tax administrations have been rapidly adapting to the new dynamic environment. Taxpayers now confront increasing demands for information and increasingly aggressive tax audits around the world, often in challenging environments. Tax administrations not only have access to information provided by taxpayers, but are actively exchanging information with other tax authorities. The landscape is likely to become even more uncertain with new rules such as the “principal purpose test” and new permanent establishment rules in the recently signed “multilateral instrument.” At the same time, tax administrations are actively exploring new approaches to cooperative compliance with taxpayers. This panel will explore:

- Global trends in examination and enforcement requirements
- The new challenges they are creating for tax departments
- Innovative approaches for avoiding and resolving tax disputes

12:30 p.m.–1:45 p.m.

Luncheon and presentation of TCPI Pillar of Excellence Award

1:45 p.m.–2:45 p.m.

Tax reform: Where are we now?

With tax reform legislation in high gear, the prospect for enactment has never been greater. In this session, we will examine the most current proposed or final enacted legislation, discuss the key areas of potential impact, and exchange insights on possible paths for moving forward in a new tax landscape.



Symposium agenda

February 15, 2018

2:45 p.m.–3:45 p.m.

Tax disruption: Adjusting to the shifting transfer pricing landscape

Post-BEPS, the required analyses and effort for transfer pricing have become significantly more complicated. This panel will examine and debate areas in which simplified methods or safe harbors might be beneficial, the trade-offs that would be required to potentially ease some compliance and examination burdens, and the perceived appetite for these initiatives. The panel will describe the ongoing work at the OECD with respect to profit splits and the attribution of profits to permanent establishments.

3:45 p.m.–4:15 p.m.

Break

4:15 p.m.–5:15 p.m.

How disruption can make us better: Embracing change to reinvent the tax department

Meaningful change and innovation are fostered by the inclusive cultures of world-class organizations that go far beyond diversity statistics. The confluence of business, technology, cultural, generational, and tax disruptions demand a new approach to tax department hiring and retention—one that is focused on fostering an inclusive work culture. We will explore how to approach these reinvention challenges, including:

- How inclusion goes beyond diversity to harness all types of differences
- The future work of the tax department
- The right composition of the tax department (technology vs. tax technical)
- Nontraditional skills on tax executives' wish lists—and why
- Leading practices to transition in new hires while creating a satisfying and safe environment for existing team members
- Sponsorship activities that can enable individual success and break down the unconscious biases that may otherwise hold talented team members back

5:15 p.m.–7:00 p.m.

Networking reception



Symposium agenda

February 16, 2018

7:30 a.m.–8:00 a.m.

Breakfast

8:00 a.m.–8:45 a.m.

Keynote address

8:45 a.m.–9:45 a.m.

The economic realities of tax reform and its impact

This panel will examine the revenue, distributional, macro-economic, and sectoral economic consequences of the most current proposed tax reform bills or final enacted legislation based on analyses from the CBO, JCT, NEC, and outside sources.

9:45 a.m.–10:45 a.m.

Tax reform: Domestic tax provisions and possible consequences for businesses

Current tax reform proposals and bills call for lower tax rates for business income, unprecedented capital expensing, and curtailment of various tax expenditures and the interest expense deduction. As tax reform legislation gets closer to final passage, we will explore how it could dramatically change the tax position of US-based and inbound businesses and the incentives underlying investment decisions. Proposed changes to individual taxation may also have a ripple effect on particular sectors of the US economy. This session will explore:

- Practical implications of tax reform on US business activities
- Potential intended and unintended consequences for different industries and business structures—corporations and pass-through entities
- Capital market reactions and possible implications for the M&A market

10:45 a.m.–11:15 a.m.

Break

11:15 a.m.–12:15 p.m.

Tax reform: International tax provisions and possible consequences for businesses

This panel will explore those US cross-border tax reform provisions that mark the sharpest departure from current law approaches. It will examine how these changes will influence the behavior of both US and non-US multinationals with particular emphasis on the challenges and opportunities these may create, including their potential impact on:

- The location of business activities by US multinationals, including the ownership of intangible property
- Financing of business activities
- International tax planning strategies generally
- Non-US-parented multinationals with US businesses

12:15 p.m.–1:15 p.m.

Tax reform: What's next?

President Trump's signature on a tax reform bill won't be the end of efforts related to reform. Many constituents and lawmakers will be active in making fixes, providing clarity, and rolling back key provisions. In this panel, we will explore:

- The inevitable legislative gaps that lawmakers and regulators will have to identify and fill, and the options available for accomplishing these
- How federal tax reform may impact state budgets and affect state tax reform initiatives
- The promised and overdue restructuring of the IRS that leadership has penciled in for this spring, and how it will impact implementation of the new tax legislation

1:15 p.m.–1:30 p.m.

Wrap up



Additional information



Program location and accommodations

The Symposium will be held at The Ritz-Carlton, 1150 22nd Street NW, Washington, DC. Room reservations should be made directly with The Ritz-Carlton by calling +1 800 241 3333 or +1 202 835 0500. You will find the hotel's amenity information at www.ritzcarlton.com.

A limited number of rooms have been reserved at a rate of \$350 per night and are available under the group name "Tax Council Policy Institute: 2018 Symposium". To obtain rooms at the group rate, please make your reservations as soon as possible, but no later than Monday, January 22, 2018. After that date, room availability and pricing cannot be guaranteed.

Who should attend?

The program is designed for CFOs, VPs of tax, VPs of finance, corporate tax directors, government tax professionals, and tax counsels, attorneys, and managers. The Symposium comprises two days of live group sessions for attendees at an intermediate to advanced level. Participants should possess an advanced knowledge of tax policy and practice.

TCPI online

For more information about the 19th Annual Tax Policy & Practice Symposium, or to learn more about past events or TCPI, please visit the TCPI website at www.tcpi.org. We will post periodic updates on the 2018 event. Website registration is encouraged.

Continuing education

Participation in the Symposium will allow you the opportunity to receive continuing education credits. TCPI is registered with NASBA and, in accordance with its policies, up to 12 CPE credits can be earned. (NASBA Field of Study: TAXATION.)

TCPI will also apply for CLE accreditation from those states that require it, which participants list on their registration form. The total amount of earned CLE credits varies by state.



The Tax Council Policy Institute is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors through its website: www.learningmarket.org.

Registration

19th Annual Tax Policy & Practice Symposium

Disruption and opportunity in the era of global tax transformation

February 15–16, 2018 | Washington, DC



Registration form

Online registration at www.tdpi.org is strongly encouraged.

Name

Preferred name on badge

Title

Company

Address 1

Address 2

City

State

Zip

Phone

Fax

Email

☐ I would like to receive CPE accreditation (no selection required)

☐ I would like to receive CLE accreditation for the following states: _____

**The conference fee includes meals as indicated in the schedule, snacks during all breaks,
and the networking reception.**

I would like to attend:

☐ \$875 (payment postmarked by January 19, 2018)

☐ \$975 (payment postmarked after January 19, 2018)

☐ \$300 Government employees and members of academia (full-time students and faculty)

☐ Please invoice me

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To pay by check, make checks payable to **Tax Council Policy Institute**, and mail your registration form and check to:

Tax Council Policy Institute

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Symposium exhibitors



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About the Tax Council Policy Institute

The Tax Council Policy Institute is a non-profit and non-partisan public policy research and educational organization. Its mission is to bring about a better understanding of significant tax policies that impact our national economy and businesses through careful study, thoughtful evaluation and open discussion. TCPI accomplishes its mission in various ways such as hosting its Annual Tax Policy & Practice Symposium in Washington, DC and sponsoring mini-symposia on important tax issues, which are largely conveyed via webcast.

Prior symposia

- 2017** Tax Policy in Transition: Diverging Views in a Converging World
- 2016** Capital Matters: How Taxes Influence the Global Creation, Deployment, and Mobility of Capital
- 2015** How Taxes Matter: The Globalization of Tax Policy and Implications for US Economic Growth and Investment
- 2014** Why Taxes Matter: The Implications of Tax Policy on Strategic Business Decisions
- 2013** Taxation of Intangibles: Implications for Growth, Jobs and Competitiveness
- 2012** The New Realities of Tax Risk Management: Navigating Risk in a Complex World
- 2011** Tax Uncertainties in a Deficit-Driver World: Designing a Blueprint for Leadership
- 2010** Tax Reform: In Search of a 21st Century U.S. Tax System
- 2009** Certainty in an Uncertain World? Resolving Cross-Border Controversies
- 2008** Future Shock? Impact of U.S. Fiscal Policy on Corporate Taxation
- 2007** Understanding the Global Tax Arena: Risk & Regulation
- 2006** The Corporate Tax Practice in the Age of Transparency: A Path Forward
- 2005** The U.S. International Tax Regime: Confronting the Challenge of the Evolving Global Marketplace
- 2004** The Corporate Tax Practice: Responding to the New Challenges of a Changing Landscape
- 2003** Jurisdiction to Tax in the New Economy: International, National, and Sub-National Perspectives
- 2002** The Future of International Transfer Pricing: Practical and Policy, Opportunities
- 2001** The R&D Tax Credit in the New Economy
- 2000** INDOPCO: Past, Present and Future