

International Tax Conference 2025

Organised by:

King's College London, University of Belgrade,
University Carlos III Madrid, Max Planck Institute for
Tax Law and Public Finance & University of Lausanne

4 June 2025

King's College London



Overview

International corporate tax controversies in the areas of Transfer Pricing and Treaty Interpretation are on the rise. Controversy is expected to further increase for MNEs because of increased public disclosures, the complexity associated with the Pillar II project, the uncertainty around the implementation of the Pillar I project as well as the current political environment.

Against this background, the International Tax Law and Policy Research Network (ITLRN) will host on June 4th, 2025, its fourth international tax event in London (United Kingdom) to discuss recent trends in managing International Corporate Tax Controversies. This event follows the successful completion of our research networks past three events which were held in Belgrade (2022), Milan (2023) and Vaduz (2024) respectively.

The purpose of this event is to explore the current and future trends in international corporate tax controversies as well as to deliberate on practical experiences when the various cross border dispute prevention and resolution tools are invoked to settle/resolve disputes.





The event starts with a Q&A session which will address the current US perspective towards taxing MNEs. Thereafter, senior tax administration officials of large emerging markets will discuss the current and future tax audit issues in their respective markets.

Subsequently, in-house tax directors of large MNEs will discuss current (and possible future tax audit issues), challenges in tax audits, in particular, practical issues in invoking cross border dispute settlement mechanisms.

Then, policy makers (representatives from the OECD, EU and UN Sub Committees) will provide us with recent updates on their work with respect to improving the various dispute prevention and resolution tools that could be invoked by MNEs to settle controversies.

Afterwards, the competent authorities / tax administrations/government officials of selected countries will discuss their practical experience in handling bilateral advance pricing arrangements (BAPA), cooperative compliance programs, mutual agreement procedures (MAPs) and arbitration (including investment treaty arbitration) for issues linked mainly to transfer pricing and treaty law.

With respect to the organisation of the event, ITLRN (the founding members which originate from the University of Belgrade, University Carlos III Madrid, University of Lausanne and members of Practise) has joined forces with Kings College London to organise the event. The event is also supported by the International CFO alliance, Tax Academy of Singapore, Tax Executives Institute, United States Council for International Business and Wolters Kluwer.

The speakers in this event include renowned experts with different backgrounds coming from academia (prominent tax law professors), tax administration/competent authorities, policy making organisations, members of private practice (international corporate tax and transfer pricing partners) and tax directors from different MNEs.

Recent trends in managing international corporate tax controversies

Registration and welcome coffee

08:00-08:30

Bush House, King's College London, Strand Campus

Please access Bush House using the South Wing entrance on the Strand (map on last page)

Opening Remarks

08:30-08:45

- Dr Stephen Daly, Reader in Tax Law, Kings College, United Kingdom
- ITLRN Representative: Prof Dr Vikram Chand (Professor, International Tax Law and Policy, University of Lausanne, Switzerland)
- Prof Dr Francesco Maiani, Professor of European Law at the University of Lausanne and Director of the University's Law School

Local hosts:

- James Anderson, Head of Europe Tax, Skadden, United Kingdom
- Dr Emmanuel Llinares, Senior Managing Director, Transfer Pricing Global Chair, NERA, France

Q&A

08:45-09:15

Q&A with Scott Levine, Former Deputy Assistant Secretary - International Tax Affairs, USA

- Moderators: Dr Stephen Daly and Prof Dr Vikram Chand

Recent trends in Managing International Corporate Tax Controversies

Panel 1: Current and future tax audit trends – Tax administrations perspective from large emerging / developing markets

09:15 - 10:45

Chairman: Prof Dr Svetislav Kostic, Professor of Tax Law, University of Belgrade, Serbia

Moderator: Prof Dr Vikram Chand

- Melanie Dewi Astuti, Senior International Tax Analyst, Fiscal Policy Agency Ministry of Finance, Indonesia
- Chetan Rao, Commissioner of Income Tax - Transfer Pricing, Income Tax Department, Government of India, India
- Carlos Protto, Director of International Tax Relations, Ministry of Economy, Argentina
- Nauryzbek Abduokhapov, Deputy Director, Transfer Pricing, State Revenue Committee of the Ministry of Finance, Kazakhstan
- Robbie Bañaga, Chief, International Tax Affairs Division, Bureau of Internal Revenue, Philippines

Coffee Break

10:35-10:55

In the Arcade, adjacent the Auditorium

Panel 2: Current and possible future tax audit issues, challenges in tax audits and practical issues in invoking cross border dispute settlement mechanisms – MNEs perspective

10:55 - 12:15

Chairman: Dr Mario Tenore, Partner, Pirola Pennuto Zei & Associati, Italy

Moderator: Dr. Stefano Simontacchi, Partner, BonelliErede, Italy

- Laurence Brochet, Vice President – Group Tax, Dassault Systèmes, France
- Siegert Slagman, Vice President Global Tax, Japan Tobacco International, Switzerland
- Vineet Rachh, Vice President, Asia Pacific, Middle East and Africa Tax, Procter & Gamble, Singapore
- Sebastiaan De Buck, Global Head of Tax, Unilever, The Netherlands

Recent trends in Managing International Corporate Tax Controversies

Panel 3: Policy Makers perspective: Recent updates on improving dispute prevention and resolution with respect to International Corporate Tax Controversies

12:15 - 13:15

Chairman: Prof Dr. Andrés Báez Moreno, Professor of Tax Law, University of Carlos III, Madrid, Spain

Moderator: Joseph Duffy, Partner, Matheson, Ireland

- Sriram Govind, Advisor, Mutual Agreement Procedures (MAP) Unit, OECD, France
- Mauro Faggion, Advisor, European Commission, Belgium
- Ingela Willfors, Director, Tax and Customs Department, Ministry of Finance, Sweden and Co-coordinator of the UN Subcommittee on transfer pricing

Lunch and launch of next year's conference – 2026

13:15-14:15

In the Arcade, adjacent the Auditorium

Panel 4: Dialogue with competent authorities: Practical insights on handling BAPAs and ICAP

14:15 - 15:30

Chairman: Prof Dr Vikram Chand

Moderators: Amanda Pletz, Managing Director, NERA, United Kingdom and David Farhat, Partner, Tax, Skadden, USA

- Jean Ussel, Transfer Pricing Competent Authority team, and SAT APA Program Director Controversy, Mexico
- Dominic Vines, Team leader of HMRC's Transfer Pricing (Competent Authority) team, United Kingdom
- Stephanie Prudent, Deputy Director of International Affairs, DGFI, France
- Fachrizal Septian, APA/MAP Competent Authority Delegate and Negotiator, Indonesia

Recent trends in Managing International Corporate Tax Controversies

Coffee Break

15:30-15:50

In the Arcade, adjacent the Auditorium

Panel 5: Dialogue with competent authorities / tax administrations: Practical insights on handling MAPs / Arbitration for Transfer Pricing issues (continued)

15:50 - 17:05

Chairman: Prof Dr Vikram Chand

Moderator: Patrick J. O'Gara, Head of UK Tax Controversy, Skadden, United Kingdom and Amanda Pletz, Managing Director, NERA, United Kingdom

- Dr Stefan Greil, Head of Unit, Ministry of Finance, Germany
- Simon Hellmers, Minister-Counsellor (Taxation), Australian Permanent Delegation to the OECD
- Stephanie Prudent, Deputy Director of International Affairs, DGFI, France
- Harm Mark Pit, Process Coordinator MAP and Arbitration Netherlands Competent Authority

Panel 6: Dialogue with competent authorities / tax administrations – Practical insights on resolving Treaty issues brought under MAPs/Arbitration relevant for international corporate taxation

17:05 - 18:20

Chairman: Dr Stephen Daly

Moderator: Mukesh Butani, Managing Partner, BMR Legal, India

- Helen Baird-Parker, Team Leader of the Tax Treaty Team, HMRC, United Kingdom
- Dr Jakub Jankowski, Deputy Director of Income Tax Department, Ministry of Finance, Poland (and lead for Pillar II implementation)
- Intouch Piyawin, Legal Officer at the Revenue Department of Thailand (and lead for Pillar II implementation)

Closing remarks: ITLRN followed by drinks reception

18:20-18:30

Reception in the Arcade, adjacent the Auditorium

Academic Partners

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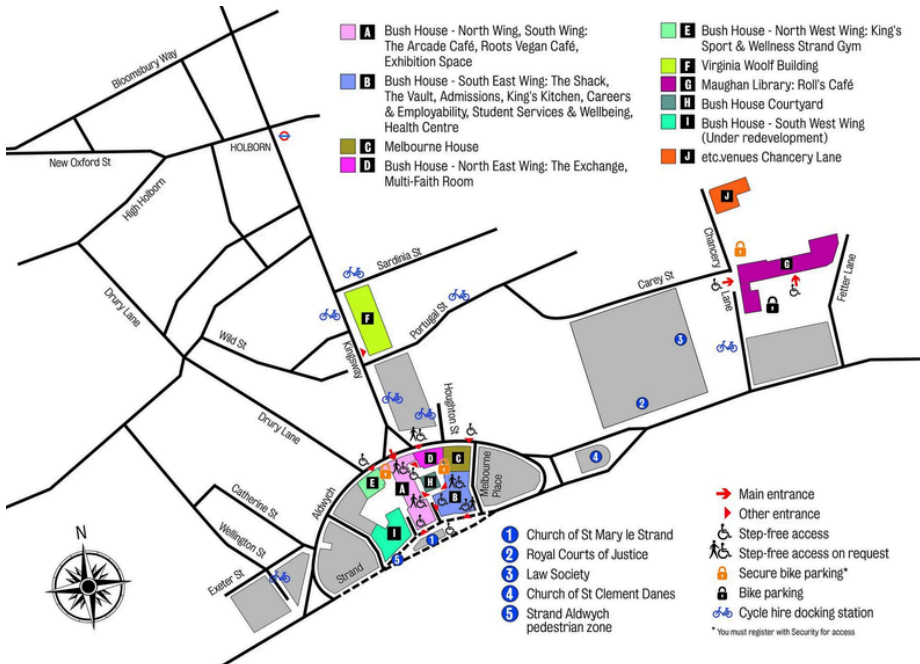
Local ITLRN Member and Co-organizer



Stephen Daly

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Bush House, King's College London



Registration

Registration for the conference:

Register to attend

The event is supported by several universities as well as law firms, consulting firms and various fiduciaries.

Contact us

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