



Invitation to tax conference: The Impact of BEPS on Business Models

**Uppsala University
16 – 17 June 2016**

The Faculty of Law at Uppsala University, with the support of the Uppsala Centre for Tax Law (*Stiftelsen Centrum för Skatterätt*)¹ and in cooperation with the Swedish IFA branch, organizes an international tax conference on the influence the OECD project on Base Erosion and Profit Shifting (BEPS) has on business models. The conference will take place in Uppsala, Sweden, on 16-17 June 2016.

With a lower threshold for permanent establishments, amendments to the OECD transfer pricing guidelines, more limited possibilities to rely on favourable regimes, tightened anti-abuse rules and other important changes to several types of rules, the BEPS project will necessarily influence the way multinational enterprises (MNE) structure their operations and design their tax strategies. MNEs will indeed need to assess the consequences of BEPS on their business models, whether they are willing to keep the models in place while adapting their tax structures to the new environment, or change the business models as a consequence of the developments following BEPS.

Moreover, despite the ambition of the BEPS project to ensure a coordinated response to the challenges raised by the modern economy, issues may arise such as differences in the rules enacted by the participating countries, diverging interpretations of similar rules and standards, or remaining harmful tax measures. EU members will also need to adapt the BEPS package to EU law, with the European Union sometimes going further than the OECD or taking another route to tackle a given issue. The distortions to the coordination objectives of the BEPS project may result in a complex combination of rules that eventually influences the way MNEs organize their business models. Therefore, in addition to understanding the influence of the BEPS project on the business models of MNEs, there is a need to analyse the rules that have been suggested and, when needed, consider alternative provisions so as to reach the objective of adapting the international tax regime to the challenges of the modern economy.

We have invited a number of experts from various fields to give their views on the impact of BEPS on how business will operate in the future. The conference will take place at Uppsala University in the middle of June, a period when the summer has arrived and we are getting close to midsummer having the longest daylight of the year. Uppsala is located just 15 minutes by train north of Stockholm airport (Arlanda).

¹ Uppsala Centre for Tax Law is a research foundation supported by Deloitte, EY, KPMG, Mannheimer Swartling, PwC, Skeppsbron Skatt (Taxand) and Svalner.

The conference fee is 4 000 Swedish crowns. A waiver of the fee is given to members of the Swedish IFA Branch and to fulltime academics. Please register at www.skatterattsligtforum.se or by sending in the attached registration sheet to uppsala2016@skatterattsligtforum.se. ***The registration is open until the 20th of May. Please observe that the number of participants is limited.***

You are most welcome!

Jérôme Monsenego
Associate Professor
Uppsala University

Bertil Wiman
Professor
Uppsala University and Director, Uppsala Centre for Tax Law

CONFERENCE PROGRAMME

16 June 2016

Venue Hall Gustavianum, Uppsala University, Akademigatan 3, 753 10 Uppsala

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| 13:00 – 13:05 | Opening of the conference, Assoc. Prof. Jérôme Monsenego |
| 13:05 – 15:00 | First block: policy issues, chaired by Prof. Bertil Wiman (Uppsala University) |
| 13:05 – 13:30 | The development of business models during the 20 th century and trends for the 21 st century, Assoc. Prof. Jan Lindvall (Uppsala University) |
| 13:30 – 14:00 | The development of the international tax regime since the 1920's and its interaction with the business models of MNEs, Prof. Hugh Ault (Boston College Law School) |
| 14:00 – 14:30 | Issues identified by the OECD and solutions proposed as part of the BEPS project, Andrew Hickman (OECD) |
| 14:30 – 14:50 | The business views on BEPS and its implementation in the G20 and EU, Assoc. Prof. Krister Andersson (Confederation of Swedish Enterprise/Business Europe) |
| 14:50 – 15:10 | Comments by the chair and panel discussion |
| <i>15:10 – 15:30</i> | <i>Coffee break</i> |
| 15:30 – 17:15 | Second block: a global perspective on the need to adapt the international tax regime to the business models of MNEs, chaired by Manuel Tron (Manuel Tron S.C. / SMPS Legal) |

- 15:30 – 15:50 UN and developing country perspectives – the potential significance of how BEPS issues have been dealt with, and of issues undealt with, Michael Lennard (UN)
- 15:50 – 16:10 The view of historical OECD members and the example of Sweden, Ingela Willfors (Swedish Ministry of Finance)
- 16:10 – 16:30 The view of recent OECD members and the example of Chile, Ricardo Escobar (Bofill Escobar)
- 16:30 – 16:50 The impact of EU law on the possibilities of EU Member States to adapt international tax rules to the business models of MNEs, Prof. Sjoerd Douma (Leiden University)
- 16:50 – 17:15 Comments by the chair and panel discussion
- 18:00 – 19:00 *Drinks at Västgöta Nation – typical student club*
- 19:00 – *Dinner at Västgöta Nation*

17 June 2016

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- 9:00 – 10:30** **Third block: suitability of the BEPS package to capture the value created by modern business models and exploration of other options, chair Prof. Hugh Ault (Boston College Law School)**
- 9:00 – 9:20 The digital economy demystified - what does BEPS imply for the digital economy?, Pär Magnus Wiséen and Dr Jesper Öberg (PwC)
- 9:20 – 09:40 Impact and suitability of the BEPS package on MNEs with globally integrated value chains, Dr Jesper Barenfeld (Volvo)
- 09:40 – 10:00 Would formula apportionment better capture the value created by modern business models?, Dr Giammarco Cottani (Ludovici & Partners)
- 10:00 – 10:30 Comments by the chair and panel discussion
- 10:30 – 11:00 *Coffee break*
- 11:00 – 12:30** **Fourth block: general organisational issues, chair Isabel Verlinden (PwC)**
- 11:00 – 11:20 Centralized and decentralized business models, Åsa Edensten (BDO)
- 11:20 – 11:40 Group structuring and profit repatriation, Prof. Bertil Wiman (Uppsala University)
- 11:40 – 12:00 BEPS and business restructurings, Mikael Hall (EY)

12:00 – 12:30	Comments by the chair and panel discussion
12:30 – 14:00	<i>Lunch</i>
14:00 – 16:30	Fifth block: specific organisational issues, chair Assoc. Prof. Krister Andersson (Confederation of Swedish Enterprise/Business Europe)
14:00 – 14:20	The impact of BEPS on the R&D function, Isabel Verlinden (PwC)
14:20 – 14:30	Comments by Yvonne Bertlin (AstraZeneca)
14:30 – 14:50	The impact of BEPS on the manufacturing function, Jolanda Schenk (Shell)
14:50 – 15:00	Comments by Mikael Hall (EY)
15:00 – 15:20	The impact of BEPS on the distribution function, Yvonne Bertlin (AstraZeneca)
15:20 – 15:30	Comments by Andrew Hickman (OECD)
15:30 – 15:55	Comments by the chair and panel discussion
15:55 – 16:00	Closing of the conference. Assoc. Prof. Jérôme Monsenego
19:00 –	<i>Cruise and dinner</i>

REGISTRATION

1. Register at www.skatterattsligtforum.se or
2. Send the registration sheet below to uppsala2016@skatterattsligtforum.se
The registration is open until the 20th May. Please observe that the number of participants is limited.

Name: _____ Member of the Swedish IFA branch:

 Company/organisation/university:

 Billing address:

 Phone:

 Email:

 Address:

List of hotels in Uppsala (codes are not required, hotels listed with increasing prices):

City Stay

Trädgårdsgatan 5A, 753 09 Uppsala

phonenumber: +46 (0) 18-12 10 00

www.citystayuppsala.se/

www.citystayuppsala.se/en/

Best Western Hotel Svava

Bangårdsgatan 24, Uppsala,

phonenumber: +46 (0)18-13 00 30

www.hotelsvava.se

www.book.bestwestern.se/en/hotels/best-western-hotel-svava-uppsala-88169

Akademihotellet

Övre Slottsgatan 5, Uppsala

phonenumber: +46 (0)18-15 51 90

www.akademihotellet.se/

www.akademihotellet.se/en/

Scandic Uppsala Nord

Gamla Uppsalagatan 50, Uppsala

phonenumber: +46 (0)18-495 23 00

www.scandichotels.se/uppsalanord

Scandic Uplandia

Dragarbrunnsgatan 32, Uppsala

phonenummer: +46 (0)18-495 26 00

www.scandichotels.se/uplandia

First Hotel Linné

Skolgatan 45, Uppsala

phonenummer: +46 (0)18-10 20 00

www.firsthotels.se/Vara-Hotell/Hotell-i-Sverige/Uppsala/First-Hotel-Linne/

Villa Anna

Odinslund 3, 753 10 Uppsala

phonenummer: +46 (0) 18-580 20 00

www.villaanna.se/

List of hotels in Stockholm, at walking distance from the train station (codes are not required, hotels listed with increasing prices):

Hotel Terminus

Vasagatan 20, 111 20 Stockholm

Phonenumber: +46 (08) 440 16 70

www.terminus.se/default-sv.html

www.terminus.se/default-en.html

Radisson Blu Waterfront

Nils Ericsons Plan 4, 111 64 Stockholm

Phonenumber: +46 (08) 505 060 00

www.radissonblu.com/sv/waterfronthotel-stockholm/hotellerbjudanden

www.radissonblu.com/en/waterfronthotel-stockholm/hotel-deals

Hotel Sheraton

Tegelbacken 6, 101 23 Stockholm

Phonenumber: +46 (08) 412 34 00

www.sheratonstockholm.se/

www.sheratonstockholm.com/

Central Hotel

Vasagatan 38, 111 20 Stockholm

Phonenumber: +46 (08) 566 208 00

www.central-hotel-stockholm.stockholmhotelz.com/sv/

www.central-hotel-stockholm.stockholmhotelz.com/en/

Clarion Sign

Östra Järnväggsgatan 35, 101 26 Stockholm

Phonenumber: +46 (08) 676 98 00

www.clarion-hotel-sign.stockholmhotelz.com