

4th INTERNATIONAL TAX CONFERENCE

第四届

国际税务峰会

Sept. 10th - 11th Beijing · China
2015/9/10-11 中国·北京

Organizers



高顿税务峰会
Golden Tax Summit



上海财经大学 商学院
COLLEGE OF BUSINESS
SHANGHAI UNIVERSITY OF FINANCE AND ECONOMICS

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Dr. K. Olsen
Global Tax Consultants

Background 背景

The international taxation field are developing rapidly, international economic activities let the enterprise income taxpayers had become more international, the investors obtained rich profit through the channel management, financiers earned huge interest by international loans , in the meanwhile, transnational taxpayers are taxed in a number of countries, and as the countries concerned on some policies are different that lead to dualtaxation problem, which led to the distribution relationship between the countries that concerned a huge problem of tax rights and interests.

This summit starts by introducing some key points in international tax planning and some emerging themes .the aim is to provide participants with an in-depth understanding of how domestic and international tax policy and updated are used in practice for international tax planning purposes. The topics covered international tax structuring involving debt financing, intangible,transfer pricing,BT reforms to VAT and recent developments following the OECD Action Plan on Base Erosion and Profit Shifting.Furthermore,GTS would invite OECD, SAT officials, fortune 500 companies and big four partners to gather in Beijing in September to discuss worldwide tax issues affecting the local companies and multinational companies while doing outbound and inbound investment.

This summit will clued by China-BT reforms to VAT-Risk Prevention,Asia Pacific-Indirect taxes-Tax Planning,Europe-Transfer Pricing-Controversy and Anti-avoidance,America-Mergers and Acquisitions-M&A Strategy。Join us! Getting the seldom and valuable opportunity.to meet tax peers and benchmarking with other companies.

国际税收领域瞬息万变，跨国经济活动让企业纳税人收入变得更加国际化，投资者通过跨国渠道经营获得丰厚的经营利润，金融家通过国际贷款等赚得巨额利息，但同时跨国纳税人面临着被多个国家征税的问题，而其中有关国家由于某些政策不同，往往就错误的造成重叠征税问题，进而导致有关国家之间税收权益的分配关系产生巨大的问题。

此次峰会将在国际税收筹划中引入一些关键的筹划点并涉及到一些新兴的主题，旨在为参与者提供一个深入了解国内和国际税收政策实践并在国际税收筹划操作中指明方向。此次峰会主题将涵盖国际税收结构中的债务融资，无形资产，转让定价，营改增和最近BEPS方案等。此外，GTS将邀请经合组织，国税总局，全球500强企业和四大合伙人在九月聚集在北京就国际税务发展的最新形势对跨国企业海内外投资的影响等话题发表自己的观点。

此次峰会将以中国-营改增-风险防范，亚太区-间接税-纳税筹划，欧盟-转让定价-争议管理，美洲-跨境收购-兼并策略为线索逐一展开，加入我们，这对于企业决策者来说必将是一次难得且有价值的机会与同袍分享并获取经验及方法。

Summit Benefit 峰会收益

- Understanding recent developments of Chinese tax reforms
获悉最近中国税收发展及纳税人如何跟进
- Getting deep insight into the step results of BT reforms to VAT and time slot related Real Estate and Finance Industry
深入了解营改增阶段成果及房地产业金融业加入时间
- Interpreting hot topics & general rules in Asia Pacific Taxation and its impact on taxpayers
解读亚太区热点问题及规章汇总以及其对纳税人的影响
- Discussing the efficient measures that taxpayers should do to mitigate the tax burden
讨论纳税人应该使用有效的方法来降低税收负担
- Establishing tax risk and control strategy for overseas merge acquisition
建立海外并购税务风险和控制策略
- Sharing international tax aspects of Mergers and Acquisitions
共享国际并购重组的要素
- Finding out transfer pricing of IP and intangibles
明确转让定价及其无形资产
- Learning the new anti-avoidance provisions
学习新的反避税条款

Who Should Attend 谁应该参加

CEO、GM、CFO、TD、FD、TM、FM、CD……
总裁、总经理、首席财务官、税务总监、财务总监、税务经理、财务经理、进出口合规总监

Sept.10 Day One

0830-0900 Registration & Networking

■ 签到

0900-0915 Opening Remark

■ 主办方致辞

0915-1000 Europe 欧盟

Keynote :

Overview of the European Corporate Tax Field

欧盟国家税务领域概述

- Efficient tax department management
有效的税务部门管理方式
- Compliance method with transfer pricing documentation and its risk strategies
合规方式:转让定价文档及其风险策略
- Manage increasing tax transparency concerns for multinationals
跨国企业增加税收透明度
- Current and future tax challenge
最近以及将来税务挑战
- Effects on investment decisions of tax uncertainty
对税收不确定性投资决策的影响

Transfer Pricing Professional / Hewlett-Packard

1000-1045 Expertise : Transfer Pricing 转移定价

Keynote: A new step forward to mitigate tax & TP Risk: An ISO 9001 Certification

主题演讲: 降低税收以及转让定价最新措施

Global Tax Practitioner, ISO Quality Auditor & Tax Professor / Dr K.Olsen Global Tax Consultants

1045-1100 Coffee & Networking

■ 茶歇及自由讨论

1100-1200 Challenge: Controversy and Anti-avoidance 争议及反避税

Dialogue: The New anti avoidance Provisions that Taxpayers should do to Mitigate Dispute in 2015

纳税人如何就新的反避税条款降低税收纠纷

- New anti avoidance rules and its effect on tax planning
新的反避税规则以及其对税收筹划的影响
- Effective and successfully dispute resolution techniques
有效和成功处理税务纠纷的方法
- Transfer pricing risk management and permanent establishments
转让定价风险管理和常设机构
- Lessons in success and failures that facing authority
面对税务局成功和失败的教训
- Beps proposals for controversy
就Beps的争议处理
- Dispute resolution and General Anti-Avoidance Rule
纠纷解决和一般反避税规则

Tax Director / Intel

Global Tax & Trade Group / Caterpillar

1200-1330 Networking Lunch

■ 午餐

1330-1415 America 美洲

Keynote : Principles of American Tax Planning 美洲税收筹划的原则

- Key points and issues in American tax planning
美洲税收筹划关键要素
- International tax structuring for MNCs
跨国企业税收结构模式
- Tax planning for transfer pricing and cross-border merge acquisitions
转让定价和跨境并购筹划
- Tax planning: strategies and tools
纳税筹划的策划及方式

1415-1500 Expertise : Mergers and Acquisitions 兼并收购

Keynote:International Tax Aspects of Mergers and Acquisitions 国际并购重组的要素

- Tax due diligence
税务尽职调查
- Planning and tax deal methods
筹划和税务处理方法
- Tax aspects of cross-border private equity acquisitions and debt financing
私人股权投资及债务融资纳税方面
- Efficient M&A deal terms and strategy
有效的并购交易条款和策略
- Key point of M&A in tax issues
并购中的关键税收点
- Cross-border M&A and its M&A litigation
跨境并购及其诉讼问题

Transfer Pricing Specialist / World Bank Group

1045-1100 Coffee & Networking

- 茶歇及自由讨论

1515-1630 Challenge:M&A Strategy 并购战略

Dialogue:Overseas M&A:Tax Risk and Control Strategy 海外并购税务风险及其控制策略

- Making full use of relevant preferential clause about tax treaty
充分利用相关优惠条款及税收协定
- Tax burden in oversea M&A
海外并购税务负担
- Optimize M&A structure
并购结构的优化
- Overseas M&A of domestic enterprises by tax policy
海外并购如何了解当地的税收政策
- Tax risk control
税务风险控制

GM Group Tax, Westpac Group Head of Taxation, Vodafone

1630 End of Conference

- 会议结束

Sept.11 Day Two

0830-0900 Registration & Networking

■ 签到

0900-0915 Opening Remark

■ 主办方致辞

0915-1000 China 中国

Keynote:

Recent Developments of Chinese Tax Reforms and How Taxpayers could Keep in Step

主题演讲：最近中国税收发展及纳税人如何跟进

- China's VAT reforms and new reforms in the offing
中国营改增的趋势及最新酝酿中的改革计划
- The impact of Article 7 on non-resident enterprises
7号文对于非居民企业的影响
- What we should make use of playing in special economic zones
如何该充分利用经济特区
- Issues for taxpayer from latest provisions
纳税人在最新的规定上需要关注的问题

Official / SAT

1000-1045 Expertise: BT reforms to VAT 营改增

Keynote: The Step Results of BT reforms to VAT and Time Slot Related Real Estate and Finance Industry

营改增阶段成果及房地产业金融业加入时间

- The step results and problem of BT reforms to VAT
阶段性营改增收效及问题
- The time slots that real estate and financial industry join
房地产业金融业营改增加入时间
- The main problem that real estate and financial enterprises facing
房地产业金融业营改增阶段企业会碰到的困难
- The preliminary planning that real estate and financial enterprises should do
房地产业金融业营改增应做好的前期规划

Official / SAT

1045-1100 Coffee & Networking

■ 茶歇及自由讨论

1100-1200 Challenge: Risk Prevention 风险防范

Dialogue: 2015 Beps Action Plan – China's Perspective

我国对于税基侵蚀及利润转移发展进展的观点

- Intangible assets and contemporaneous documents in transfer pricing
转让定价无形资产及同期资料
- Guard against tax convention abuse
税收协定防止滥用
- Rules of the Controlled Foreign Company
受控外国公司规则
- Proposal of harmful tax behavior
有害税收行为的建议

Tax Director / Daimler

Tax Director / Gezhouba

1200-1330 Networking Lunch

- 午宴

1330-1415 Asia Pacific 亚太地区

Keynote:

Hot Topics & General Rules in Asia Pacific Taxation and its Impact on Taxpayers

亚太区热点问题及规章汇总以及其对纳税人的影响

- New and updated tax treaties
更新的税收协定法规
- Latest permanent establishment in Asia Pacific
最近亚太地区常设机构的建立
- Beps tendency of Asia Pacific governments and its risks
Beps于亚太地区的趋势及其风险
- Impact of FATCA in Asia Pacific
亚太地区的银行和基金FATCA的影响

Tax Director / Reed Elsevier

1415-1500 Expertise: Indirect taxes 间接税

Keynote: Summary of the general indirect trend and development in APAC

亚太地区间接税趋势及发展综述

- Asia Pacific indirect tax updated
亚太区间接税政策更新
- Important recent development in key countries
关键国家最近重要的发展
- Specific issues that result in dispute in key Asian countries
亚太区主要国家争议的具体问题
- Lessons from how to deal by a tax authority
与税务机关沟通的教训
- Using technology to support taxpaying
利用技术信息来支持纳税

Manager of Taxes / IBM

1500-1515 Coffee & Networking

- 茶歇及自由讨论

1515 -1630 Challenge: Tax Planning 纳税筹划

Dialogue: The Efficient Measures that Taxpayers should do to Mitigate the Tax Burden (Korea India, Japan, Australia)

纳税人应该使用有效的方法来降低税收负担

- Updated with tax treaties in Asia Pacific
亚太国家税收协定政策更新
- New Tax Planning ideas in Asia Pacific
最新亚太国家纳税筹划方法
- Latest ruling on permanent establishment in Asia Pacific
最近亚太国家关于常设机构的规定
- What is FATCA and its impact in Asia Pacific
什么是海外纳税筹划方案以及他对于亚太国家的影响

CFO / Henkel Tax Director Greater China & Russia / Cummins

1630 End of Conference

- 会议结束

Registration Information 报名信息

Please Register for Me

Seminar Name: 4th International Tax Conference
 Date: Sept.10-11

FOUR EASY WAYS TO REGISTER



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Payment should be made within 7 days of registration. All registrations must be paid in advance of the event.

HOW MUCH?

Select Package	Register by 20th May,2015	Register by 20th June,2015	Register after 20th July,2015
Conference	<input type="checkbox"/> RMB 8000	<input type="checkbox"/> RMB 9000	<input type="checkbox"/> RMB 10000
Workshop	<input type="checkbox"/> RMB 4000	<input type="checkbox"/> RMB 4500	<input type="checkbox"/> RMB 5000
Pre-Seminar	<input type="checkbox"/> RMB 2000	<input type="checkbox"/> RMB 2250	<input type="checkbox"/> RMB 2500

METHOD OF REMITTANCE

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Opening Bank: 022582- Shanghai Buyecheng Branch of ICBC

WHEN AND WHERE

10-11 Sept. 2015

Venue

JW Marriott
 No.83 Jian Guo Road,
 China Central Place,
 Chaoyang District,
 Beijing

Delegates are responsible for the arrangement and payment of their own travel and accommodation.

PERSONAL DETAILS

1st Delegate Mr/Mrs/Ms

Job title/Dept

Company

Address

Telephone

Fax

Email

Nature of Business

Billing Address (if different from above address)

2nd Delegate Mr/Mrs/Ms

Job title/Dept

Company

Address

Telephone

Fax

Email

3rd Delegate Mr/Mrs/Ms

Job title/Dept

Company

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Telephone

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Line Manager Mr/Mrs/Ms

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Booking Contact Mr/Mrs/Ms

Job title/Dept

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Past Conference Review 往届活动掠影



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