



IBFD

2nd Africa Tax Symposium

Trends in International Taxation: An African Perspective

Programme 4 - 6 May 2016

Lake Victoria Serena Resort, Entebbe, Uganda

This symposium is an initiative of the IBFD Centre for Studies in African Taxation, a think tank devoted to the study and development of African taxation



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Pre-Symposium Events - Registration and Cocktail Reception: Tuesday, 3 May

- 12:00 – 17:00** **Pre-Symposium Registration**
Guests of the Lake Victoria Serena Resort can pre-register at their convenience
- 19:00 – 22:00** **Cocktail Reception**

Wednesday, 4 May: Trends in International Taxation - Post-BEPS Landscape

- 08:00** **Registration**
- 09:00 Convenor's Introductory Remarks
Kennedy Munyandi, Manager Africa, Middle East & Latin America, IBFD, Netherlands
- 09:15 Opening Remarks
Sam van der Feltz, Chief Executive Officer, IBFD, Netherlands
- 09:30 Keynote Address by Guest of Honour
Doris Akol, Commissioner General, Uganda Revenue Authority, Uganda
- 10:00 Surveying the Post-BEPS Landscape – The Future of International Tax Policy
Belema Obuoforibo, Director IBFD Knowledge Centre, IBFD, Netherlands
- 10:30** **Morning Refreshments and Photo Session**
- 11:00 OECD/G20 BEPS Project – The Next Steps
Richard Parry, Head of Global Relations Division - CTPA, OECD, France
- 11:45 Aggressive Tax Planning in the African Context – Cross-Border Transactions & Tax Treaty Abuse
Elandre Brandt, Partner, Webber Wentzel Attorneys, South Africa
- 12:30** **Networking Lunch**
- 14:00 An Overview Survey of Post-BEPS Anti-Avoidance Measures – Lessons from Across the Globe
Monia Naoum, Managing Senior, Middle East and North Africa, IBFD, Netherlands
- 14:45 BEPS and Beyond in Africa
Sol Picciotto, Emeritus Professor, Lancaster University, United Kingdom
- 15:30** **Afternoon Refreshments**
- 16:00 Transfer Pricing – Key Developments and Challenges for Africa
Charles Makola, International Tax Partner and Tax Policy Leader, EY, South Africa
- 16:45 Recent Developments and Changes to the UN Model Tax Convention
Michael Lennard, Chief, International Tax Cooperation, FDO, United Nations, United States
- 17:30** **End of Day 1 Sessions**

Thursday, 5 May: Taxation & Doing Business in Africa - A Practical Perspective

- 08:30 Transfer Pricing in West Africa – Policies, Practices and Issues
Noël-Faustin Kouame, Manager – Transfer Pricing Unit, Bile-Aka, Brizoua Bi & Associates, Ivory Coast
- 09:10 Taxation of the Extractive Industry in Africa and Current Challenges
Taiwo Oyedele, Partner, West Africa Tax Leader, PwC
- 09:50 Taxation of the Telecommunications Industry in Africa – Selected Issues
Mohamed Ben Mlik, Senior Manager, Group Tax, MTN, United Arab Emirates
- 10:30 Morning Refreshments**
- 11:00 Convergence of Tax Treaties and Domestic Tax Laws
Emily Muyaa, Managing Senior, Sub-Saharan Africa, IBFD, Netherlands
- 11:30 Tax Treaty Negotiation in Africa – Policies and Challenges
Laila Benchekroun, Head of International Tax Treaties Unit, Ministry of Economy & Finance, Moroccan General Administration of Taxes, Morocco
- 12:00 Limitation of Benefits Provisions in African Tax Legislation
Francis Kamulegeya, Country Senior Partner, PwC, Uganda
- 12:30 Networking Lunch**
- 14:00 The East African Community Multi-Lateral Tax Treaty – Fit for Purpose?
Johann Hattingh, University of Cape Town, South Africa
- 14:45 Adjudication of International Tax Disputes – Challenges and Opportunities for Domestic Judiciary
Pramod Kumar, Member, Income Tax Appellate Tribunal, Ministry of Law & Justice, India
- 15:30 Afternoon Refreshments**
- 16:00 Resolution of Tax Treaty Disputes – Challenges of Mutual Agreement Procedures for Africa
Annet Wanyana Oguttu, Tax Law Subject Head, University of South Africa, South Africa
- 16:45 Strategies for Developing Capacities and Skills in African Institutions
Kennedy Onyonyi, Director, Institutional Development and Capacity Building, African Tax Administration Forum, South Africa
- 17:30 End of Day 2 Sessions**
- 19:30 Symposium Gala Dinner**



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Friday, 6 May: Taxation & Doing Business in Africa - A Practical Perspective

- 08:30 Doing Business in Emerging Markets
Chijioke Uwaegbute, Tax Director – Sub-Saharan Africa, GE, Nigeria
- 09:10 Corporate International Tax Structuring: Investing in Africa through Holding Company
Jurisdictions – Recent Tax Treaty Developments
Ridha Hamzaoui, Regional Tax Manager, IBFD, Netherlands
- 09:50 Business Restructuring – Transfer Pricing Aspects
Nikhil Hira, Partner, Tax, Deloitte East Africa, Kenya
- 10:30 Morning Refreshments**
- 11:00 Business Restructuring: Indirect Transfer of Assets – The Ugandan Experience
Ruth Sebatindira, President, Uganda Law Society and Partner, Ligomarc Advocates, Uganda
- 11:45 Business Restructuring: Mergers and Acquisitions in the COMESA Region – Regulatory
Considerations
Willard Mwemba, Head of Mergers and Acquisitions, COMESA Competition Commission, Malawi
- 12:30 Closing Remarks**
Belema Obuoforibo, Director IBFD Knowledge Centre, IBFD, Netherlands
- 13:00 End of Symposium/Networking Lunch**
- 14:00 Optional Tours**

For more details and to register: www.ibfd.org