6th BRAZILIAN CONGRESS OF INTERNATIONAL TAX LAW
Tax Harmonization in Economic Diversity: the BEPS Plan and Developing Countries
University of São Paulo Law School - São Paulo - Brazil
19, 20 and 21 August 2015

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Professor Alcides Jorge Costa

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CLAUDIO SACCHETTO (Italy) University of Turin
DANIEL GUMMANN (France) University of Paris 1
DAVID ROSENBOOM (USA) New York University
DENNIS WEBB (Netherlands) University of Amsterdam
JACQUES MAHNER (Belgium) Catholic University of Louvain
LISELOTT KANA (Chile) UN Committee of Experts on International Cooperation in Tax Matters
MICHAEL LANG (Australia) Economic University of Vienna
MICHAEL LENNARD (USA) UN International Tax Cooperation Section
RAINER PROKISCH (Netherlands) Maastricht University
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YARIV BRAUNER (USA) University of Florida

Brazilian Speakers
EVERARDO MACIEL Former Head of the Brazilian Revenue Service
HELENO TORRES University of São Paulo
HUMBERTO ÁVILA Universitaries of São Paulo and Rio Grande do Sul
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Why the BEPS Action Plan?
Willard Taylor, Everardo Maciel

Action 1: Digital Economy
Rainer Proksch, Sergio Andéi Rocha

Action 2: Hybrid Mismatches
Daniel Gummann, Roberto Quiroga Mosquera

Action 3: CFC Rules
Yariv Brauner, João Francisco Bianco

Action 4: Interest Deduction
Jacques Mahner, Ricardo Maria de Oliveira

Action 5: Harmful Tax Practices
Dennis Webber, Luís Eduardo Schoueri

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Michael Lang, Paulo Ayres Barreto

Action 7: Avoidance of PE Status
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Actions 8, 9, 10 and 13: Transfer Pricing
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Ana Paula Dourado, Humberto Ávila

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Claudio Sacchetti, Marco Aurélio Greco

Action 15: Multilateral Instrument
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