



**UN Capacity Development Programme
in International Tax Cooperation**

**Workshop on UN Course on Transfer Pricing
Panama City, Panama, 11-12 December 2014**

TENTATIVE PROGRAMME

Thursday, 11 December 2014	
9:00 - 9:15 am	<i>Welcoming Remarks</i> UN Secretariat/CIAT
9:15 - 11:00 am	<i>Presentation and Discussion of Draft Materials on “Business Framework” and “General Legal Environment”</i> <u>Chair</u> : Mr. Stig Sollund , Director-General, Head of International Tax Section, Ministry of Finance, Norway; Coordinator, Subcommittee on Transfer Pricing <u>Presenter</u> : Prof. Mike Kobetsky , Associate Professor, University of Melbourne, Australia <i>Round-table discussion with interventions by country representatives and other participants</i>
11:00 - 11:15 am	<i>Coffee break</i>
11:15 am - 12:30 pm	<i>Presentation and Discussion of Draft Materials on “Business Framework” and “General Legal Environment” (continued)</i> <u>Chair</u> : Ms. Nishana Gosai , Manager, Transfer Pricing (Large Business Centre), South African Revenue Service <u>Presenter</u> : Prof. Mike Kobetsky , Associate Professor, University of Melbourne, Australia <i>Round-table discussion with interventions by country representatives and other participants</i>
12:30 - 2:00 pm	<i>Lunch break</i>
2:00 - 3:00 pm	<i>Presentation and Discussion of Draft Materials on “Business Framework” and “General Legal Environment” (continued)</i> <u>Chair</u> : Mr. Jose Madariaga Montes , Senior Manager International Group, Deloitte Chile <u>Presenter</u> : Prof. Mike Kobetsky , Associate Professor, University of Melbourne, Australia <i>Round-table discussion with interventions by country representatives and other participants</i>
3:00 - 3:15 pm	<i>Coffee break</i>
3:15 - 5:00 pm	<i>Presentation and Discussion of Draft Materials on “Documentation”</i> <u>Chair</u> : Mr. T.P. Ostwal , Senior Partner, T.P. Ostwal & Associates, Chartered Accountants, India <u>Presenter</u> : Ms. Monique van Herksen , Global Head of Transfer Pricing Controversy and EMEIA Head of Tax Controversy, Ernst & Young, The Netherlands <i>Round-table discussion with interventions by country representatives and other participants</i>

Friday, 12 December 2014	
9:00 - 10:45 am	<p><i>Presentation and Discussion of Draft Materials on “Audits and Risk Assessment”</i> Chair: Mr. Stig Sollund, Director-General, Head of International Tax Section, Ministry of Finance, Norway; Coordinator, Subcommittee on Transfer Pricing Presenter: Mr. Jose Madariaga Montes, Senior Manager International Group, Deloitte Chile <i>Round-table discussion with interventions by country representatives and other participants</i></p>
10:45 - 11:00 am	<i>Coffee break</i>
11:00 am - 12:30 pm	<p><i>Presentation and Discussion of Draft Materials on “Dispute Avoidance and Resolution”</i> Chair: Ms. Nishana Gosai, Manager, Transfer Pricing (Large Business Centre), South African Revenue Service Presenter: Ms. Monique van Herksen, Global Head of Transfer Pricing Controversy and EMEIA Head of Tax Controversy, Ernst & Young, The Netherlands <i>Round-table discussion with interventions by country representatives and other participants</i></p>
12:30 - 2:00 pm	<i>Lunch break</i>
2:00 - 3:00 pm	<p><i>Presentation and Discussion of Draft Materials on “Dispute Avoidance and Resolution” (continued)</i> Chair: Mr. Jose Madariaga Montes, Senior Manager International Group, Deloitte Chile Presenter: Ms. Monique van Herksen, Global Head of Transfer Pricing Controversy and EMEIA Head of Tax Controversy, Ernst & Young, The Netherlands <i>Round-table discussion with interventions by country representatives and other participants</i></p>
3:00 - 3:15 pm	<i>Coffee break</i>
3:15 - 5:00 pm	<p><i>Presentation and Discussion of Draft Case Study on “Comparability Analysis” and “Transfer Pricing Methods”</i> Chair: Mr. T.P. Ostwal, Senior Partner, T.P. Ostwal & Associates, Chartered Accountants, India Presenters: Ms. Monique van Herksen, Global Head of Transfer Pricing Controversy and EMEIA Head of Tax Controversy, Ernst & Young, The Netherlands Mr. Giammarco Cottani, Office-Advisor on International Tax, Central Assessment Directorate, Italian Revenue Agency <i>Round-table discussion with interventions by country representatives and other participants</i></p>
5:00 - 5:15 pm	<p><i>Conclusions and Closing Remarks</i> Mr. Stig Sollund, Director-General, Head of International Tax Section, Ministry of Finance, Norway; Coordinator, Subcommittee on Transfer Pricing UN Secretariat/CIAT</p>