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The accelerated pace of globalization and the pressures of aligning tax planning with an increasingly interconnected global supply chain, together with the rapid succession of global tax policy and legislative changes, and increased enforcement and co-operation between tax authorities have created unprecedented challenges for tax executives and their advisors. Across the globe, either in response to the need for additional revenue or as a means of remaining competitive by trying to retain and attract large multinationals, governments have introduced many new tax legislative and administrative changes over the last year. With its comprehensive program dealing with a wide array of international tax developments, International Tax Day equips tax executives to better deal with these challenges and identify opportunities. We hope you can join us!

Thursday, 10 November 2011

Toronto Board of Trade, First Canadian Place
77 Adelaide St. West, Main Ballroom, 4th floor

Plenary sessions

Tax administration without borders – We'll discuss the forces driving unprecedented change in the global tax landscape and the impacts that the resulting increases in tax controversy and risk management are having on multinationals.

Recent cases of interest – Members of the Tax Litigation group of Couzin Taylor LLP (allied with Ernst & Young in Canada) will discuss recent court decisions of importance in the international tax planning context.

Canadian legislative and administrative tax update and other matters of interest – We will discuss recent tax developments of significance to multinationals, including the 19 August foreign affiliate legislative proposals, and will provide an update on various CRA administrative positions.

Transfer pricing – controversy and administrative update – Transfer pricing continues to be the number-one concern of tax executives of multinationals. We'll cover issues such as current developments and controversy trends, competent authority and APA matters, and issues with respect to cross-border financial transactions.

Treasury management and cross-border financing – The increasing popularity of centralized treasury and currency management centres has led to an increase in the areas where the tax executive of a multinational corporation has a role to play. We will discuss some of the challenges that come with the increased role as well as future trends. We will also provide an update on recent developments regarding cross-border financing.

Concurrent sessions

Our concurrent sessions will allow you to pursue the areas of greatest relevance to your company's international tax situation. Our panelists will provide an update on recent developments in three major jurisdictions as well as transfer pricing. Topics covered will include tax treaties, TIEAs, major foreign tax legislative changes, VAT and other matters of interest.

Session #1

- i. EU tax legislative update
- ii. US tax legislative update

Session #2

- iii. Transfer pricing - business restructuring and TESCM
- iv. Latin America tax legislative update

Agenda

- 8:00 a.m.** Registration and continental breakfast
- 8:45** Opening remarks
- 9:00** Tax administration without borders
- 9:45** Recent cases of interest
- 10:45** Break
- 11:00** Canadian legislative and administrative tax update and other matters of interest
- 11:45** Transfer pricing – controversy and administrative update
- 12:30 p.m.** Lunch
- 1:50** Concurrent session #1
- 2:50** Concurrent session #2
- 3:40** Break
- 3:50** Treasury management and cross-border financing
- 4:50** Wrap-up/Closing Remarks
- 5:00** Reception

Registration

[Register online](#) by Tuesday 1 November 2011.

Participants attending this workshop will be eligible for continuing professional development credits.

The registration fee is \$125 (+ HST) per person and includes continental breakfast, lunch, cocktail reception, conference materials and a 30-day trial subscription to the Canadian Tax Library on Ernst & Young Client Portal.

GST Registration #R130866262

Note: We ask that participants ensure their registration and attendance at this seminar are in compliance with their company's pre-approval and governance policies.

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Tax Executives Institute is the pre-eminent professional organization of in-house tax professionals. Our members are business executives who are responsible for taxation matters on an administrative or policy-making level, or whose work is otherwise primarily concerned with the problems of business taxation. TEI members are accountants, lawyers, and other corporate and business employees who are responsible for the tax affairs of their employers in an executive, administrative, or managerial capacity.

Today the institute has more than 7,000 members, aligned in 56 separate chapters, and representing over 3,200 leading businesses in the United States, Canada, Europe and Asia. Approximately 10% of TEI's members are affiliated with Canadian corporations.