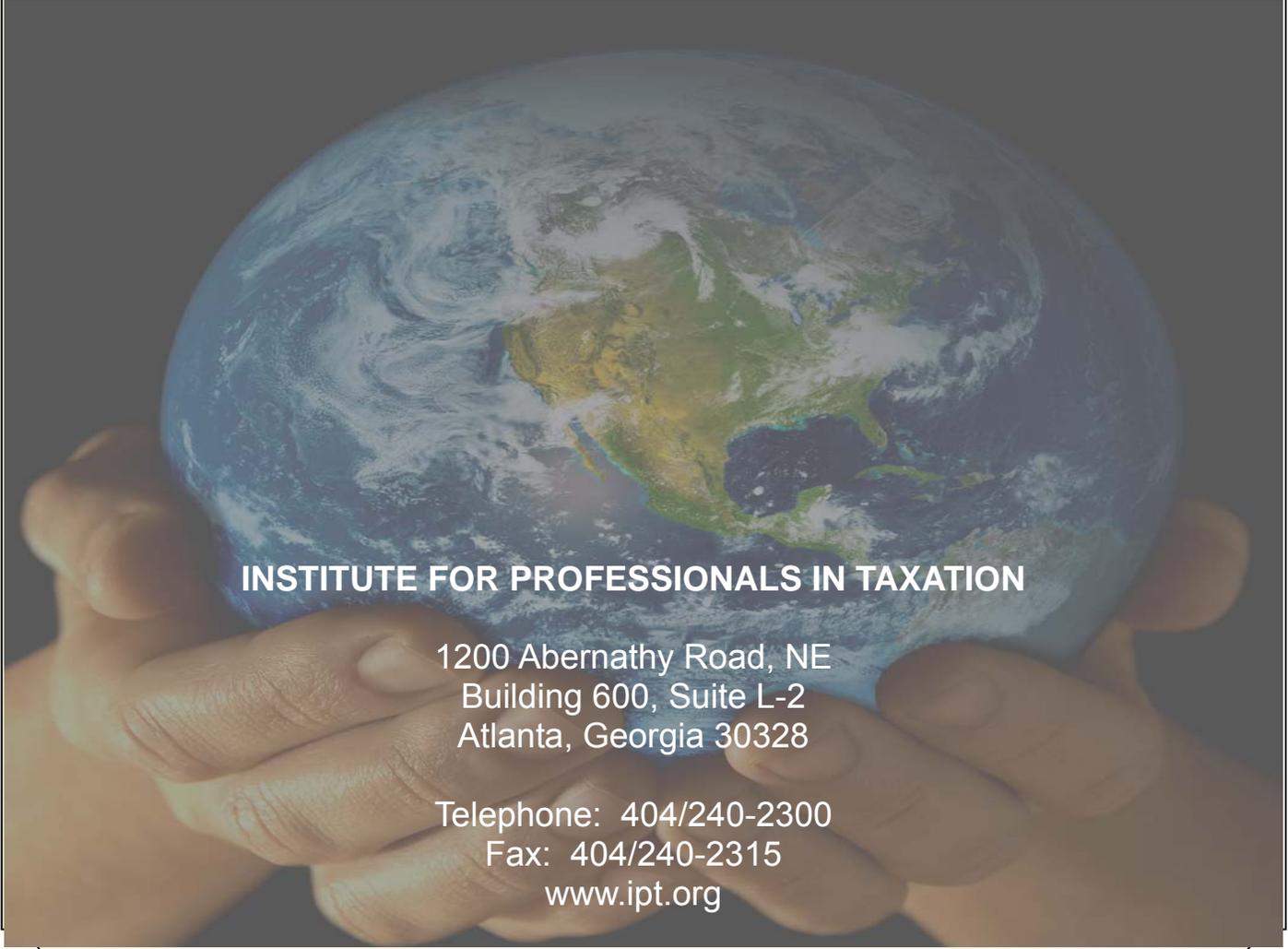


VAT Symposium

**The Mason Inn Conference Center
George Mason University
Fairfax, Virginia
September 18 - 21, 2011**



INSTITUTE FOR PROFESSIONALS IN TAXATION

1200 Abernathy Road, NE
Building 600, Suite L-2
Atlanta, Georgia 30328

Telephone: 404/240-2300
Fax: 404/240-2315
www.ipt.org

PROGRAM AT A GLANCE

SUNDAY, September 18

3:00-6:00pm	Registration
6:30-7:30pm	Welcome Reception

MONDAY, September 19

8:15-8:30am	Program Opening
8:30-12:00pm	Basics of VAT Advanced VAT Issues
10:30-10:45am	Break
12:00-1:30pm	Lunch
1:30-3:00pm	KEY VAT Cases
3:00-3:20pm	Break
3:20-5:00pm	Developments in the European Union and Canada
5:30-6:30pm	Reception

TUESDAY, September 20

8:30-10:00am	Breakout Sessions (select one) √ Manufacturing and Distribution √ Telecommunications and Media √ Financial Services
10:00-10:30am	Break
10:30-12:00pm	Breakout Sessions (select one) √ Retail/Remote Sales √ Services/Digital/Consulting/Cloud
12:00-1:30pm	Lunch
1:30-3:00pm	Breakout Sessions (select one) √ Asia-Pacific √ Central and South America
3:00-3:30pm	Break
3:30-5:00pm	Practical Supply Chain Issues
5:30-6:30pm	Reception

WEDNESDAY, September 21

8:30-10:00am	Developing a Global VAT Operation
10:00-10:15am	Break
10:15-11:15am	VAT Automation
11:15-11:45am	VAT Reform Around the World
11:45-12:00pm	Wrap-Up

SUNDAY, September 18

3:00-6:00pm Registration

6:30-7:30pm Welcome Reception

MONDAY, September 19

8:15-8:30am Program Opening

8:30-12:00pm **Basics of VAT**

This session will focus on the basic operations of a VAT, key concepts in VAT such as exemptions, zero-rating, taxable persons, transactions subject to tax, and place of supply. The session will also discuss the basic economic concepts of VAT, the administration of cross-border transactions, and the general compliance obligations imposed on VAT Taxpayers. To enhance the understanding of U.S. SUT professionals of how VAT works, a comparison will be made between GRT, RST and different types of VAT.

Learning Objectives – to understand:

- The basic legal terminology common in VAT;
- The concepts of taxable person, taxable transactions, and place of supply;
- Different methods of dealing with cross-border transactions;
- The manner in which VAT is collected through the supply chain and its impact on final consumer prices;
- The mechanics through which businesses are relieved from VAT;
- The differences between GRT, RST and VAT;
- The mechanics of exemptions and the impact on consumer prices;
- The administrative obligations imposed on VAT taxpayers.

Speakers:

Karen Christie, CTA
VAT Managing Director
Ernst & Young LLP
New York, NY

Kenneth W. Helms, CMI
Manager, Value Added Tax
Ryan, LLC
Atlanta, GA

Shoab Malak, CTA
Director, Global VAT Services
Deloitte Tax LLP
San Francisco, CA

OR

Advanced VAT Issues

This session will explore several advanced topics in VAT policy, administration and compliance. Among the topics to be addressed are planning techniques to reduce trapped VAT credits and VAT costs; current and emerging audit issues and approaches, and the imposition of other reporting requirements to aid government tax authorities in securing VAT compliance.

Learning Objectives – to understand:

- Planning opportunities and traps in a VAT regime;

MONDAY, September 19 - continued

- Audit issues and approaches;
- Issues involved in various reporting obligations.

Speakers:

VAT Planning Techniques and Issues

Benno Tamminga, CTA

Director Global VAT Services

Deloitte Tax LLP

New York, NY

Richard de Grave

Senior Manager, Global VAT Services

Deloitte Tax LLP

New York, NY

Emerging Audit Issues and Approaches

James D. Robinson

Senior Manager, Global Indirect Tax

KPMG LLP

Mountain View, CA

Customs and Other Reporting Issues

Christopher S. Hall, CMI, CMA

Manager - Indirect Taxes, The Americas

Ford Motor Company

Brentwood, Essex, England

10:30-10:45am Break

12:00-1:30pm Lunch

1:30-3:00pm **Key VAT Cases**

This session will discuss the seminal cases from the European Union that have shaped the bulk of the jurisprudence around the modern VAT. Where practical, cases will be discussed with reference to analogous situations in retail sales taxes. The intent is for the session to be a 'building block' in a baseline VAT understanding and to focus on the major cases dealing with key VAT concepts.

Learning Objectives:

- Identify and discuss the major holdings in the leading EU VAT cases;
- Compare and contrast those cases and holdings with similar leading sales and use taxes in the U.S.; and
- Identify key aspects of VAT transactions for assessing taxability, place of supply, exemption and other key attributes.

Speakers

Leah Durner, Esq.

Principal

KPMG LLP

Washington, DC

Reena Reynolds

Director

PricewaterhouseCoopers LLP

Chicago, IL

MONDAY, September 19

3:00-3:20pm Break

3:20-5:00pm **Developments in the European Union and Canada**

This session will review recent developments in VAT policy and administration in the European Union and Canada. The session will review recent administrative and legal developments in the EU, implementation experience with the 2010 VAT Package, the Green Paper being developed on the future of the EU VAT policy, and anticipated near-term developments. As to Canada, the session will focus on implementation of the HST regimes in British Columbia and Ontario, the temporary recapture of input credits in these provinces, as well as new nexus and place of supply rules and new regulations for financial institutions.

Learning Objectives – to understand:

- Major changes contained in the 2010 VAT Package;
- Major policy issues being considered in the EU;
- Patterns of national-subnational VATs in Canada; and
- New nexus, place of supply and financial institution regulations.

Speakers:

European Union

Evelyn Lam

Director

PricewaterhouseCoopers LLP

New York, NY

Canada

Carlos V. Hernandez

Senior Manager Sales Tax

GE Capital

Danbury, CT

5:30-6:30 pm Reception

TUESDAY, September 20

8:30-10:00am Breakout Sessions:

Manufacturing and Distribution

This session introduces and discusses the VAT issues faced by manufacturers and distributors active in global markets. In particular, the session will look at traditional models of manufacturing and distribution and will analyze alternatives to these models with a view toward ensuring compliance yet avoiding unnecessary VAT costs.

Learning Objectives – to understand:

- VAT implications of cross-border supplies of goods;
- Traditional manufacturing, contract manufacturing and other models and the VAT implications of each; and
- Traditional and alternative distribution models and the VAT implications of each.

Speakers

Benno Tamminga, CTA

Director Global VAT Services

Deloitte Tax LLP

New York, NY

TUESDAY, September 20 - continued

Kenneth W. Helms, CMI

Manager, Value Added Tax
Ryan, LLC
Atlanta, GA

Telecommunications and Media

Sourcing telecommunications and media service transactions under a VAT can be difficult and cumbersome. In addition, the EU is preparing to implement a significant change in its place of supply rules for such services in 2015. This session will explore the current and emerging issues in applying VAT to the telecommunications and media sector.

Learning Objectives – to understand:

- The current and future VAT rules for sourcing transactions in the telecommunications and media fields;
- The compliance burdens and issues for these service providers; and
- Approaches taken in the industry to managing VAT responsibilities.

Speakers

Shoab Malak, CTA

Director, Global VAT Services
Deloitte Tax LLP
San Francisco, CA

Nathan Trautwein

Director
PricewaterhouseCoopers LLP
San Francisco, CA

Financial Services

Most countries have traditionally exempted financial services from VAT because of difficulties in determining the “price” charged for certain services. The exemption approach raises a number of issues and consequences that will be explored in this session along with a variety of audit, compliance and VAT recovery issues. The session will also examine some of the more recent approaches to subjecting financial services to VAT.

Learning Objectives – to understand:

- The basic principles of taxing financial services under a VAT regime;
- The audit and compliance issues that arise from exemption;
- The economic and business implications of exempting financial services from VAT; and
- Recent efforts to impose VAT on the financial services sector.

Speakers

Chris Needham

Global VAT/GST Director
General Electric Company
Leeds, West Yorkshire, England

Richard de Grave

Senior Manager, Global VAT Services
Deloitte Tax LLP
New York, NY

10:00-10:30am Break

TUESDAY, September 20 - continued

10:30-12:00pm Breakout Sessions:

Retail/Remote Sales

There is a common perception that retailing only requires knowledge and application of the simplest, most fundamental, and well established VAT principles. This session will show why that perception is wrong given the recent evolution of retailing business practices and models, as well as the recent trends in VAT legislation. In particular, we will see how cross-border shopping, digitization of products, and the unique dynamics of online commerce dramatically increase the complexity of VAT challenges faced by retailers.

Learning objectives – to understand:

- The various conditions that could subject a retailer to VAT collection/remittance responsibilities.
- The difficulties of reconciling VAT legal requirements with business/technical realities.
- How recent trends in VAT legislation affect retailers – for the better and for the worse.

Speakers

Gary Bendes

Tax Director - Global Indirect Taxes
Amazon.com
Seattle, WA

Jan Snel

Principal
Baker & McKenzie Amsterdam
The Netherlands

Services/Digital/Consulting/Cloud

This presentation will cover issues specific for today's remotely delivered services, including digital products, computing services and consulting. In particular, the session will focus on concepts such as where services are enjoyed, whether VAT is recoverable under various scenarios, and cross-border issues inherent in a cloud environment.

Learning Objectives – to understand:

- The basic principles of sourcing relevant for various services;
- The practical implications of VAT in a cloud environment; and
- Cross-border issues.

Speakers

Representative

IBM Corporation

Sandy Nicolson

Managing Director
KPMG LLP
Mountain View, CA

12:00-1:30pm Lunch

1:30-3:00pm Breakout Sessions

Asia-Pacific (including China and India)

TUESDAY, September 20 - continued

This session will present an update on developments and case law in the Asia-Pacific Region with a special view toward emerging developments and issues in Malaysia, India and China – each of which is or has undertaken major changes to the VAT regime.

Learning Objectives – to understand:

- The main features of the GSTs introduced or under consideration in Malaysia and India;
- The principal features of the VAT reform underway in China; and
- Other developments in the region.

Speakers

Dr. Robert F. Van Brederode

Atlanta, GA

Howard Lambert

Senior Manager, Global VAT and GST

Ernst & Young LLP

Irvine, CA

Central and South America

This session will present an update on VAT administrative and case law developments in Central and South America, with some emphasis on the complexities and issues in Brazil.

Learning Objectives – to understand:

- Developments in Central and South America
- Relationship between central and subcentral taxes in Brazil
- Difficulties in securing VAT recoveries in Brazil

Speakers

Marcio Naka

Ernst & Young LLP

New York, NY

Kathya C. Peimbert

Senior Associate, Tax - Transaction Tax Systems (TTS)

KPMG LLP

Portland, OR

Raquel Quintana Zafra

KPMG LLP

Boston, MA

3:00-3:30pm Break

3:30-5:00pm **Practical Supply Chain Issues**

With increasing globalization, properly managing VAT obligations and assessing their potential impact on the supply chain is of growing importance to minimize the impact of VAT on company costs. This session will focus on the impact of VAT on the business supply chain and include a discussion of various approaches to dealing with certain issues, traps for the unwary and desirable practices. The session will utilize a case study approach.

Learning Objectives – to understand:

- The impact of various cross-border transaction rules on the business supply chain;
- Various approaches to managing the impact of VAT on supply chain operations;

TUESDAY, September 20 - continued

- Identify VAT issues that could result in unanticipated VAT costs if not properly managed.

Speakers

Colin Ager

Global Indirect Taxes Manager
Caterpillar Inc.

Christopher S. Hall, CMI, CMA

Manager - Indirect Taxes, The Americas
Ford Motor Company
Brentwood, Essex, England

(Moderator)

Thomas A. Boniface, CPA

Indirect Tax - National VAT Leader
PricewaterhouseCoopers LLP
New York, NY

5:30-6:30 pm Reception

WEDNESDAY, September 21

8:30-10:00am **Developing a Global VAT Operation**

This session will explain the need for the development of a VAT strategy and the subsequent design of an indirect tax department within an enterprise with global operations. The requirements and demands and, therefore, the optimal design of a VAT department will vary among enterprises to the degree that they are different in culture, business objectives and in manner of organization. Where we can learn from others, this session offers the experience and insights of 3 different companies with issues and options available when organizing the VAT operations of a multinational enterprise.

Learning objectives – to understand:

- The impact of the changing regulatory and societal environment on the need for VAT management;
- The methodology in designing the operations and responsibilities of a VAT department;
- The building stones of a VAT department and an indirect tax control framework;
- Risks and opportunities in indirect tax; need for goal setting;
- Relationship of the VAT department with all stakeholders;
- Principles of compliance and planning management.

Speakers

Gary Bendes

Tax Director - Global Indirect Taxes
Amazon.com
Seattle, WA

Chris Needham

Global VAT/GST Director
General Electric Company
Leeds, West Yorkshire, England

WEDNESDAY, September 21 - continued**Roel van Hal**

Indirect Tax Global Process Owner
ExxonMobil
Machelen, Belgium

(Moderator)

Dr. Robert F. Van Brederode

Atlanta, GA

10:00-10:15am Break

10:15-11:15am **VAT Automation**

Complying with VATs around the world can be a burdensome and information-intensive task that must be managed on a transaction-by-transaction basis in real time. The appropriate application of technology to VAT management is critical to achieving effective compliance and controlling costs. This session will examine trends and issues in the automation of VAT compliance operations with a focus on the functionality and options available to taxpayers, issues of installation and integration with existing ERP systems, and the interface with tax authorities.

Learning Objectives – to understand:

- The purpose of tax management and the role of technology therein;
- The available approaches and technology tools available;
- The issues to be addressed in implementing a technology solution; and
- What are considered to be “best practices” in the field.

Speakers

Stephen W. James, CTA

Principal
KPMG LLP
Mountain View, CA

Erik Van Der Hoeven

Head Indirect Tax Technology Group - US
Alvarez & Marsal Tax, LLC
Seattle, WA

11:15-11:45am **VAT Reform Around the World**

This session will provide an overview of reform trends around the globe including efforts to expand taxation in certain sectors, new approaches by tax authorities and comprehensive reforms being proposed in certain countries. The discussion will include a review of the drivers of these reforms and the implications for global businesses.

Learning Objectives – to understand:

- The nature and general trends in various VAT reform efforts; and
- The primary drivers of reform.

Speaker

Jeffrey N. Saviano, Esq.

Americas Director of Indirect, State and Local Tax Services
Ernst & Young LLP
New York, NY

11:45-12:00pm Wrap-Up

PROGRAM COMMITTEE

V A T

Gary Bendes

Tax Director - Global Indirect Taxes
Amazon.Com
Seattle, WA

Thomas Boniface, CPA

Indirect Tax-National VAT Leader
PricewaterhouseCoopers LLP
New York, NY

Karen Christie, CTA

Principal
Ernst & Young, LLP
New York, NY

Harley T. Duncan, Chair

Tax Managing Director
KPMG LLP
Washington, DC

Christopher S. Hall, CMI, CMA

Manager - Indirect Taxes, The Americas
Ford Motor Company
Brentwood, Essex

Karl Heinz Haydl

GE

Kenneth W. Helms, CMI

Manager, VAT
Ryan LLC
Atlanta, GA

Carlos V. Hernandez

Senior Manager Sales Tax
GE Capital
Danbury, CT

Sandra J. Jacobs, CMI

Sr. Director, Indirect Tax
Best Buy Enterprise Services, Inc.
Richfield, MN

Laura Leahy

IGS Contracts Tax Lead
International Business Machines
Southbury, CT

Faranak Naghavi, CPA

Partner - National Director
Ernst & Young LLP
Washington, DC

Chris Needham

Global VAT/GST Director
GE
Leeds, West Yorkshire

Frank B. Sangster

Principal, International VAT Practice
KPMG LLP
Philadelphia, PA

Mike Spivey

Best Buy

Benno Tamminga

Director—Indirect Tax
Deloitte Tax LLP
New York, NY

Warren D. Townsend, CMI

Senior Director Specialty Tax
Wal-Mart Stores, Inc.
Bentonville, AR

Dr. Robert van Brederode

Atlanta, GA

REGISTRATION

All registrations must be completed in advance of the Symposium. As well as covering the usual Symposium expenses, the fee includes Sunday through Tuesday night receptions, two luncheons (Monday and Tuesday), refreshment breaks, and symposium materials. Symposium materials and registration packets may be picked up at the IPT Registration Desk in the hotel between 3:00 p.m. and 6:00 p.m. on Sunday, September 18th. Those who arrive after the desk closes may pick up registration materials after 7:30 a.m. on Monday morning.

To encourage early registration, the fee structure is as follows for registration fees received by the IPT Office:

Through August 19th:

CMI Members	\$ 475.00
Individual Holds Membership in IPT:	\$ 575.00
Individual Not Holding Membership (Company has IPT member):	\$ 775.00
Non-Member - Individual and Company:	\$1,000.00

After August 19th:

There is an additional charge of \$25.00 for each of the above categories.

CANCELLATION FEE

\$100 for any filed registration. After September 9th, no refunds will be made. For more information regarding administrative policies such as complaint and refund, contact our office at (404) 240-2300.

SUBSTITUTION FEE

Prior to August 19th: \$40.00 After August 19th: \$50.00

CREDIT CARDS

The Institute accepts the following credit cards: American Express, MasterCard, and Visa. Please carefully follow the instructions on the IPT Registration Form if paying by credit card. Also be sure to note, where indicated, the correct and **complete** billing address for the credit card if it differs from your registration address.

CONTINUING EDUCATION CREDIT

The Institute for Professionals in Taxation is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State boards of accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN, 37219-2417. Web site: www.nasba.org.

Approximately 18.5 continuing education credit hours are available for full program attendance. In accordance with the standards of the National Registry of CPE Sponsors, CPE credits have been granted based on a 50-minute hour. CMIs will obtain hour-for-hour continuing education credits for actual session attendance.

<i>Prerequisites:</i>	None
<i>Program Level:</i>	Intermediate Overview
<i>NASBA Field of Study:</i>	Taxation
<i>Instructional Method:</i>	Group Live
<i>Advanced Preparation:</i>	None

As required by regulatory agencies, IPT must verify individual attendance at sessions in order to grant Continuing Education Credits. Each attendee's name badge has a unique bar code that identifies that individual. In order to obtain CE credit, the individual must have his or her bar-coded badge scanned during the first 15 minutes of each session. No credit for the session will be given to un-scanned attendees. Lost name badges should be reported immediately to the registration desk for a replacement. Each attendee will be emailed a Certificate with the record of his or her scanned attendance approximately two weeks after the end of the program.

CMI DESIGNATION

The Institute for Professionals in Taxation's designation "Certified Member of the Institute" (CMI) is available to anyone who is a member of the Institute in good standing and who meets all other requirements. The purpose of the certification program is to further the professional development of its members. For further information, please contact the IPT Office or visit the Institute's web site (www.ipt.org).

THE MASON INN CONFERENCE CENTER AND HOTEL

Nestled among a natural wooded setting on the southside of George Mason University campus is The Mason Inn. This Fairfax, Virginia hotel is designed to be a first-class venue hosting world-class conferences with an environment conducive to academic and business interactions. The Mason Inn embodies the ideas of George Mason, the man, while incorporating the Patriot image and mission. From an initial welcome in the handsomely appointed lobby to a much-needed break in the comfortably sophisticated Mason Lounge, each guest is greeted with impeccable service. Visitors are immersed in a setting that reflects the integrity, professionalism, and spirit of the university around them.

IPT has a negotiated special Symposium room rate with the Mason Inn Conference Center and Hotel of \$199 plus tax for a Single, \$275 plus tax for a Double. Reservations can be made by calling the Reservation office at 703/865-5705; reference the IPT VAT Symposium or online at: https://reservations.ihotelier.com/crs/g_reservation.cfm?groupID=552705&hotelID=73874

Reservations should be made with the hotel by **August 20, 2011** to ensure receiving the group rate. After this date, or once the room block is filled, reservations requested will be on a space available basis. The hotel accepts cash, major credit cards, or travelers checks. In order to guarantee a reservation, a deposit equivalent to one night's room and tax or the guarantee of the same by a major credit card is required. Please check with the hotel regarding their cancellation policy.

The IPT registration form is available on IPT's website: www.ipt.org