

**INSTITUTE FOR PROFESSIONALS IN TAXATION®**

**2014**

**Value Added Tax Symposium**

**September 17 - 19, 2014**

**Crystal Gateway Marriott**

**Arlington, Virginia**



**PROGRAM**

## WEDNESDAY, SEPTEMBER 17

11:00 a.m. – 2:00 p.m.

### Registration

1:00 p.m. – 3:00 p.m.

### Breakout Sessions (2)

#### ❖ *Introduction to VAT*

This session will provide a basic understanding of VAT and key concepts in VAT, such as exemptions, zero rating, place of supply, administration of cross-border transactions, etc., from an EU VAT perspective. The session will include how VAT works in practice, key terminology, general compliance obligations and how to determine the appropriate VAT treatment of a transaction (supply of goods vs supply of services). The session will also include a comparison of VAT, US Sales and Use Tax and Canadian goods and services, Harmonized and Provincial Sales Tax.

After attending this session, the participant will be able to:

- Understand the mechanics of VAT (how VAT works)
- Understand VAT terminology
- Gather understanding of basic VAT treatment of various supply chain transactions
- Understand importance of VAT compliance and potential consequences of non-compliance
- Understand administrative obligations imposed on tax payers
- Review of differences among VAT / SUT / GST
- Identify VAT compliance impacts resulting from EU taxable activities

*Speakers:*

#### **Mark Houtzager**

Principal  
US VAT, Inc.  
Brooklyn, New York

#### **Zdenek Vajnlich**

Senior International VAT Manager  
Meridian Global Services  
New York, New York

#### ❖ *Advanced VAT Topics*

This session will provide more advanced professionals an opportunity to share and discuss current topics of interest and concern. The session will have a focus on compliance challenges and tactics and approaches used by rogue taxing authorities.

After attending this session, the participant will be able to:

- Understand current critical topics US headquartered companies deal with in their day-to-day operations
- Understand various approaches in dealing with these critical topics
- Understand particular industry-specific issues and practices

## WEDNESDAY, SEPTEMBER 17 (continued)

*Speakers:*

**Rick Franke, LLM**

Partner

Franke VAT Specialists

Grootebroek, The Netherlands

**Corin Hobbs**

Senior Manager

Ernst & Young LLP

San Jose, California

3:00 p.m. – 3:30 p.m.

Break

3:30 p.m. – 5:00 p.m.

### **Breakout Sessions (2)**

#### **❖ *Current Audit Issues and Trends***

The objective of this session is to share topical developments in the area for VAT audits across tax jurisdictions. The session will touch on current hot issues of relevance, developing trends, most effective audit management techniques and strategies, and best practices. This session will also highlight the role that technology can play, as well as focus on the interplay between audit experience and VAT risk management and controls.

After attending this session, the participant will be able to:

- Understand how to prepare for and manage an audit in various taxing jurisdictions
- Identify similarities and differences between a US sales tax audit with a VAT audit
- Learn what are some of the key areas of special attention VAT auditors are applying in audits in various countries
- Understand best practices in dealing with certain tax authorities

*Speakers:*

**Mark Houtzager**

Principal

US VAT, Inc.

Brooklyn, New York

**Andrew Street**

Director, Global Indirect Tax/International Tax

Deloitte Tax LLP

Chicago, Illinois

#### **❖ *Technology's Role in Managing Customs, Duties, Excise Taxes and Other Reporting Requirements***

In addition to tax compliance, multinational organizations must manage a number of regulatory requirements. This session will provide an overview of these non-tax obligations, and discuss the role that tax compliance technology can play in fulfilling those requirements. In addition, the session

will examine how utilization of tax, trade and customs information can drive value for the overall organization.

After attending this session, the participant will be able to:

- Understand the primary challenges and solutions related to cross-border transaction reporting
- Understand how technology is helping companies to more effectively manage data for cross-border trade
- Learn what off-the-shelf applications are available to assist with reporting
- Identify key organizational stakeholders and strategies for ensuring all relevant teams are engaged and supportive

*Speakers:*

**Alex C. Kuperman**

Senior Manager | EY Global Trade, Indirect Tax Services  
Ernst & Young LLP  
Chicago, IL

**Niren Saldanha**

Managing Director  
KPMG LLP  
Chicago, Illinois

5:30 p.m. – 7:00 p.m.      Welcome Reception

## **THURSDAY, SEPTEMBER 18**

7:30 a.m. – 8:30 a.m.      Continental Breakfast  
(for attendees staying under IPT's hotel room block)

8:30 a.m. – 10:00 a.m.      **General Session**  
***EU 2015 Changes (including other countries adopting similar regimes)***

This session will provide an understanding of the planned EU 2015 changes in the field of telecommunication, broadcasting and electronically-supplied services and their change in terms of place of supply rules when such services are provided by EU-established organizations. It will further clarify the rules in establishing the correct place of supply in light of the customer's residence/establishment and shall provide information on the development of MOSS (Mini One Stop Shop) and the portal in the respective EU Member States.

After attending this session, the participant will be able to:

- Understand the change in place of supply rules from 2015 and consequences for affected companies
- Understand how to determine the place of supply for electronically-provided services to ensure proper VAT compliance
- Understand the concept of One Stop Shop registration for EU companies (2015 changes)
- Understand current rules for non EU providers of electronically-supplied services (One Stop Shop VAT registration in one EU Member State)

- Identify VAT compliance impacts on sellers of the above type of services

*Speakers:*

**Alexander M. Baulf**

International VAT Manager  
Grant Thornton LLP  
Chicago, Illinois

**Zdenek Vajnlich**

Senior International VAT Manager  
Meridian Global Services  
White Plains, New York

10:00 a.m. – 10:30 a.m.

Break

10:30 a.m. – 12:00 p.m.

**General Session**

***Case Study on setting up a Global Indirect Tax Organization at Starbucks Coffee***

This session covers the real life experiences at Starbucks during the development of their risk management plan, determination of regional and global work and integration into daily business; includes lessons learned and future stages. This session will also provide real examples of using tax engine software, ERP systems or other tools to manage tax risks and raise visibility of VAT impacts.

After attending this session, the participant will be able to:

- Understand how to get started – assessing the current indirect tax organization and tax risks
- Identify objectives and priorities to build into the plan
- Understand strategies for implementing, integrating and communicating
- Explore technology tools to manage risks and raise visibility
- Discuss challenges encountered and lessons learned

*Speakers:*

**Paula Borhauer, CMI**

Director, Indirect Tax  
Starbucks Corporation  
Seattle, Washington

**Scott Belding, CPA**

Senior Manager  
KPMG LLP  
Midland, Michigan

**Mark Houtzager**

Principal  
US VAT, Inc.  
Brooklyn, New York

**Frans van Driel**

Senior Manager Indirect Tax and Customs EMEA  
Starbucks Coffee EMEA BV  
Amsterdam, The Netherlands

## THURSDAY, SEPTEMBER 18 (continued)

12:00 p.m. – 1:00 p.m.

Lunch

1:00 p.m. – 2:15 p.m.

### **General Session**

#### ***North American VAT (Canada and Mexico)***

This session will survey the Canadian sales tax landscape, highlight recent developments in each jurisdiction, and provide insight on key GST/HST and QST challenges for organizations doing business in Canada. Discussion will focus on legislative measures introduced over the past year, relevant court decisions, and the potential for further changes on the horizon. Topics will include: new limitations on input tax credit claims; the Government of Canada's approach to e-commerce; ongoing difficulties with the recapture of input tax credits; and recent audit trends.

The session will also cover the recent tax reform in Mexico. Many US-headquartered companies have, over time, developed a cozy familiarity with Mexico's indirect tax and its relatively simple Federal-level system and special regimen for the toll manufacturing companies (also called the Maquiladoras), but that is now fast changing. Pressed by declining tax revenues, the Mexican government found politically more palatable to modify and reduce the privileged status of the maquiladoras that manage an IMMEX program (drawback system for imported goods), creating new challenges. This session will analyze the ongoing process of change and how it is impacting corporations established in that jurisdiction.

This session will analyze the ongoing process of change and how it is impacting companies dealing with the change.

After attending this session, the participant will be able to:

- Understand the latest developments and trends in Canadian sales tax
- Understand the new limitations on the Input Tax Credit and the difficulties in recapturing the Input Tax Credit
- Develop a better understanding of the Mexican Tax Reform and its impact on companies dealing with the changes

*Speakers:*

#### **Jim Day, CPA, CA**

Director, Client Support Services  
Ryan, ULC  
Mississauga, Ontario  
Canada

#### **Oscar Mata**

Senior Tax Director  
Lear Corporation  
El Paso, Texas

2:15 p.m. – 3:15 p.m.

### **General Session**

#### ***Compliance Challenges***

U.S.-based companies are becoming increasingly involved in the VAT compliance processes for their foreign affiliates and operations in order to ensure proper oversight, reduce risk, promote consistency across the

enterprise and achieve economies of scale where possible. As a result, they have developed various models for the compliance operation that they consider to be best-suited to their organization. This session will look at the various approaches companies have taken in organizing their multinational VAT compliance operations and evaluate the challenges and opportunities that each presents as well as certain other factors affecting the compliance process. It will also examine at a high level the role of technology in many compliance organizations.

After attending this session, the participant will be able to:

- Identify and discuss the various organizational approaches to international VAT compliance
- Discuss the strengths and weaknesses of each model
- Identify factors that would lead an organization to one model over another for VAT compliance purposes
- Outline the role of technology in VAT compliance organizations

*Speakers:*

**Yannick Einsweiler**

Director, Transaction Tax Analytics  
KPMG LLP  
Short Hills, NJ

**TBD**

3:15 p.m. – 3:30 p.m.

Break

3:30 p.m. – 5:00 p.m.

**General Session**

***Indirect Taxes in the BRIC Countries***

Economists coined a catchy acronym to represent Brazil, Russia, India and China's budding economies at a similar stage of new economic development and the BRIC countries quickly became the yardstick for economies that are highly promising but also deeply challenging. In this session, we will analyze the indirect tax system of the BRIC countries, as they are arguably among the most complex tax jurisdictions in the world - with multi-level indirect taxes across administrative levels and some of them in the forefront of innovation around the use of technology by tax authorities.

After attending this session, the participant will be able to:

- Understand the difference between multi-level countries (most of BRIC) and single-level countries (e.g., Mexico)
- Understand the indirect tax structures in the BRIC countries, the different taxes and how they are assessed
- Analyze the tax-related pitfalls of operating in the BRIC countries

*Speaker:*

**Lily Kang, CPA**

Seconded Partner  
Chinese Center of Excellence  
KPMG LLP  
New York, New York

**Camilo Martinez, JD**  
Business Consultant  
Thomson Reuters  
Boston, Massachusetts

6:00 p.m. – 7:30 p.m. Reception

## **FRIDAY, SEPTEMBER 19**

7:30 a.m. – 8:30 a.m. Continental Breakfast  
(for attendees staying under IPT's hotel room block)

8:30 a.m. – 10:00 a.m. **General Session**  
***Top 10 Mistakes for U.S.-based Companies***

This session will cover common mistakes made by multinationals in handling Value Added Tax ranging from how multinationals globally handle indirect material purchasing (service contracts) to direct material purchases (goods). This session will include “what not to do” with examples of how costly mishandling foreign purchases can be for a global multinational.

After this session, the participant will be able to:

- Understand common mistakes made by multinationals in managing their indirect taxes
- Understand common VAT issues related to purchasing of goods and services
- Understand resources available to help multinationals with their unique indirect tax issues

*Speakers:*

**Ela Choina**  
Principal – Central Region VAT Leader  
Ernst & Young LLP  
Chicago, Illinois

**Colleen M. Freeburg, Esq.**  
Global Director – Indirect Taxes GM  
General Motors Company  
Detroit, Michigan

10:00 a.m. – 10:30 a.m. Break

10:30 a.m. – 12:00 p.m. **Breakout Sessions (2)**  
**❖ *VAT Recovery and Credit Utilization***

The objective of this session is to provide a detailed overview of effective VAT refund and credit management. Among the topics to be discussed are recovery of routine VAT return refunds, ensuring maximization of input tax credit identification, planning and mitigation strategies for trapped VAT, financial institutions and partial exemption methods, EU 8th and 13th Directive claims, credit realization through offsets against other tax types or

credit factoring, and legislative/government relations aspects of refund and credit management.

After attending this session, the participant will be able to:

- Understand the complexities and scope of VAT Recovery
- Review the relevant European Union VAT Directives concerning refunds
- Impact of legislative changes on VAT recovery
- How can a company identify VAT exposure or VAT leakage
- Learn How to maximize VAT and related cash-flow savings

*Speakers:*

**Les Baer**

President, North America, VAT Reclaim  
Meridian Global Services  
White Plains, New York

**Andrew Street**

Director, Global Indirect Tax/International Tax  
Deloitte Tax LLP  
Chicago, Illinois

**❖ Other EU Issues and Developments - Certificate of Entry – Germany (Gelangensbestätigung); SAF-T – OECD 7/23/2014**

This session will cover some of the specific VAT issues / rules applicable in certain EU countries making the EU VAT system complex and country specific. The session will cover among others:

- \* Spanish reverse charge mechanism applicable to the sale of goods by non-established supplier regardless of the status of the recipient (as long as taxable person), as well as challenges with input VAT deduction/recover for US organizations.
- \* German certificate of entry bringing additional administrative requirement on suppliers selling goods from Germany to other EU countries.
- \* Italian bank guarantee challenges and usual exporter status
- \* UK mitigation of taxable basis by offsetting against VAT paid in other EU Member States essentially bringing VAT exposure in certain specific situations potentially to minimum
- \* Requirement in the Czech Republic to confirm receipt of credit note to enable supplier to account for input VAT, customer's liability for unpaid VAT by supplier when paid to non-published supplier's bank account
- \* Slovakia - additional reporting requirements forcing companies to issue invoices (risk for distance seller)

This session will further cover a brief overview of the recent changes aimed at promoting compliance and administrative cooperation such as the quick reverse charge and various cross-border rulings, as well as information on Standard Audit File developed by OECD.

After attending this session, the participant will be able to:

- Identify significant VAT reporting trends that are being adopted globally
- Understand the country specifics from a VAT perspective
- Gather understanding of the recent VAT developments in the EU as well as the changes currently being in the pipeline by the EU Commission

*Speakers:*

**Thorsten Gattinger**

VAT Manager  
General Motors Company  
Detroit, Michigan

**Zdenek Vajnlich**

Senior International VAT Manager  
Meridian Global Services  
White Plains, New York

12:00 p.m.

Symposium concludes

## **2014 VAT Symposium Sponsors**

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## **2014 VAT Symposium Committee**

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Partner  
Ernst & Young LLP  
Washington, DC

**Harley T. Duncan**

Tax Managing Director  
KPMG LLP  
Washington, DC

### **Members**

**Paula Borhauer, CMI**

Director, Indirect Tax  
Starbucks Corporation  
Seattle, Washington

**Camilo Martinez, JD**

Business Consultant  
Thomson Reuters  
Boston, Massachusetts

**Colleen M. Freeburg, Esq.**

Global Director – Indirect Taxes GM  
General Motors Company  
Detroit, Michigan

**Zdenek Vajlich**

Senior International VAT Manager  
Meridian Global Services  
White Plains, New York

**Christopher S. Hall, CMI, CMA**

Office of Tax Counsel  
Ford Motor Company  
Dearborn, Michigan

## GENERAL INFORMATION

### REGISTRATION

The IPT [registration form](#) is available on IPT's website at [www.ipt.org](http://www.ipt.org). The form can be completed online, and then printed out for mailing, faxing, or emailing to IPT. All registrations must be completed in advance of the Symposium. As well as covering the usual Symposium expenses, the fee includes the evening receptions, one luncheon, refreshment breaks, and course materials. Registration packets may be picked up at the IPT Registration Desk in the hotel between 11:00 a.m. and 2:00 p.m. on Wednesday, September 17<sup>th</sup>.

There is an early-bird discount of \$50 off the normal registration fee if the form is submitted by the August 22<sup>nd</sup> deadline. The fee structure is as follows for registrations received by the IPT Office:

	By August 22 <sup>nd</sup>	After August 22 <sup>nd</sup>
Individual Personally Holds Membership in IPT:	\$595.00	\$645.00
Individual Not a Member; Company has Members	\$795.00	\$845.00

Any on-site registrations will incur a surcharge of \$50.00.

There is also a substitution charge of \$40 before August 22, 2014, or \$50 after that date (substitute must be someone from your company).

### CANCELLATION FEE / REFUNDS

Refunds, subject to a \$100 cancellation fee, will be made upon written notification of cancellation, which must be received by September 5, 2014, 5:00 pm EST. No refunds will be given after September 8, 2014.

Should you have any questions, please call 404-240-2300 or e-mail the Registrar, Toby Miller, at [tmiller@ipt.org](mailto:tmiller@ipt.org).

### CREDIT CARDS/CHECKS

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

Make any checks payable to: Institute for Professionals in Taxation  
and mail to:  
Institute for Professionals in Taxation  
1200 Abernathy Rd., NE, Suite L-2  
Atlanta, GA 30328

### HOTEL INFORMATION AND RESERVATIONS

The VAT Symposium is being held at the Crystal Gateway Marriott, 1700 Jefferson Davis Highway, Arlington, Virginia 22202. Phone: 703-920-3230. Reserve your accommodations directly with the Crystal Gateway Marriott by: calling the hotel's reservation center at 800-228-9290 (be sure to request a room in IPT's Value Added Tax Symposium room block) or by using the hotel's website, [click here](#), and complete your online registration. IPT has a negotiated special Symposium room rate with the Crystal Gateway Marriott of \$209.00 plus tax for a single or \$219.00 plus tax for a double.

All reservations must be accompanied by a first-night room deposit or guaranteed with a major credit card. Cancellations made within 72 hours of arrival will forfeit one night's room and tax. Make your reservations early to ensure availability. Accommodations requested after August 28, 2014, or sooner if the block sells out, cannot be ensured.

### TRANSPORTATION

The hotel is 2 miles from Reagan National Airport and offers complimentary shuttle service. Taxi fare (one way) is approximately \$10.00 USD.

Washington Dulles International Airport is 27 miles from the hotel. The hotel does not provide shuttle service to or from this airport. Taxi fare (one way) is approximately \$45.00 USD.

Please refer to the [Metropolitan Washington Airports Authority](#) website for further information.

### **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 submitted to the National Registry of CPE Sponsors through its website: [www.learningmarket.org](http://www.learningmarket.org).

Approximately 15.5 continuing education credit hours are available for full program attendance, Wednesday to Friday. 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 attendance. Registrants who wish to obtain credit from other organizations for the Symposium may use the Certificate of Attendance provided by IPT for this program.

<i>Prerequisites:</i>	<i>None</i>
<i>Program Level:</i>	<i>Overview of Timely Value Added Tax Issues</i>
<i>NASBA Field of Study:</i>	<i>Taxation</i>
<i>Instructional Method:</i>	<i>Group Live</i>
<i>Advanced Preparation:</i>	<i>None</i>

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 able to request a copy of his or her scanned attendance (Certificate of Attendance) through the IPT website on the "My Participation" tab approximately two weeks after the end of the program. IPT has requested continuing legal education credit for this program in the state of Virginia. Many states have reciprocal agreements-it is up to each individual to check with the appropriate organization regarding information on obtaining CLE credit as an individual. Additional questions regarding CLE should be directed to Christina Webb via email at: [cwebb@ipt.org](mailto:cwebb@ipt.org). The number of CLE hours of credit awarded depends upon the organization/state.

### **SYMPOSIUM MATERIALS**

Approximately a week prior to the program, speaker papers will be available online for access by program attendees. Click the Sign-In button in the upper right-hand corner of the home page and log in with your Username (Member/User ID #) and password; it will take you back to the home page. Click on your name in the upper right-hand corner, and then on the "My Participation" tab on the following page where you will see meetings for which you are currently registered. Find the 2014 VAT program and go to the "Click Here" link on the right under Program Info to view and print available papers.

### **CONSENT TO USE OF PHOTOGRAPHIC IMAGES**

Photos will be taken at this event. These may be published in IPT publications, multimedia presentations, website, LinkedIn and Facebook pages, as well as other IPT-related social media sites. Registration and attendance at, or participation in, IPT meetings or other activities constitutes agreement by the registrant/speaker/attendee to IPT's use and distribution of the registrant's, speaker's or attendee's image or voice in photographs, videotapes, electronic reproductions, and tapes of such events and activities. Tape recording of sessions is not permitted.