

VAT Symposium

JW Marriott Indianapolis
Indianapolis, IN
September 21 - 23, 2016



WEDNESDAY, September 21

11:00-1:00pm Registration

1:00-3:00pm Breakout Sessions (*select one*)

Introduction to VAT - Basics

This introductory session to VAT will provide a general overview of the application of Value Added Tax (VAT) from an EU VAT perspective. The attendees will learn the basic principles of VAT, how VAT works, the VAT concepts like place of supply of goods/services, exempt supplies, zero rated supplies, VAT compliance obligations, input and output VAT, VAT recovery etc. The session will also focus on VAT and cross-border transactions in the European Union and typical transactions that would cause a VAT liability for a foreign (e.g., US) company. VAT registration and subsequent VAT compliance obligation (submission of VAT returns, Intrastat, EC Sales Lists) will also be part of this session for VAT beginners. We will also review some basic transactions that may cause for a US company a VAT registration and related VAT compliance obligations.

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

- Recognize how VAT works (basic principles)
- Be familiar with basic VAT terminology
- Grasp the concept of Place of Supply Rules for goods and services
- Gain understanding of principles of cross-border transactions (in the EU), principles of intra-Community supplies/acquisitions, Reverse Charge Mechanism

Speakers:

Mark Houtzager

US VAT, Inc.

Brooklyn, New York

Zdenek Vajnlich

Meridian Global Services

Prague, Czech Republic

WEDNESDAY, September 21 (cont.)

Advanced VAT Topics

This session will provide more advanced VAT professionals an opportunity to discuss current VAT topics of interest and concern. The session will have a focus on the Global VAT considerations with respect to centralized supply contracts / inter-company agreements and the potential for such contracts to create incremental VAT costs using real life examples and best practices. The session will also cover the ongoing uncertainty regarding the concept of 'fixed establishment' in the EU. Again, real life examples will be used to highlight the differing views that various EU tax authorities are taking on this issue.

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

- Identify the potential risk of creating incremental VAT costs when entering into global contracts or intercompany agreements
- Gain an understanding of the complex case law and legislation around the concept of 'fixed establishment' in the EU and recognize some of the key triggers that may create a 'fixed establishment' when operating in the EU

Speakers:

Lionel van Rey
Ernst & Young LLP
Chicago, Illinois

Philip Walton
Deloitte Tax LLP
Chicago, Illinois

3:00-3:30pm Break—**Sponsored by MK Strategies**

3:30-5:00pm Breakout Sessions (*select one*)

Managing the Global Indirect Tax Function

Given the intense competitive and regulatory pressures in today's global marketplace coupled with cross

WEDNESDAY, September 21 (cont.)

functional dependencies, many businesses are realizing the need for better VAT management. Status quo is not an option.

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

- Provide guidance and perspective on managing a Global VAT function
- Provide management the insight it needs for operational success

Speakers:

Shawn K. Carter, CPA

Baker Hughes, Inc.
Houston, Texas

Colleen Freeburg, Esq.

General Motors Corporation
Detroit, Michigan

Faranak Naghavi, CPA

Ernst & Young LLP
Washington, DC

ERP Automation

If your company is among the 93% of corporations in some phase of changing its business model or technology, this session will help you in understanding the intricacies of a global integration of an Indirect Tax Determination software for VAT, SUT and GST to an ERP. With an eye on tax global mindset, consistency and standardization, this session will cover keys to building a global business case, technology challenges and suggestions and thoughts for a successful deployment. Provided will be a real life example of how a Fortune 100 company successfully approached its global implementation project.

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

- Plan to meet local indirect tax compliance in a global role

WEDNESDAY, September 21 (cont.)

- Recognize options and trends in the global indirect tax market
- Identify keys to a successful implementation
- Grasp how to measure success

Speakers:

Diego Cinquemani, CMI

Viacom Inc.

New York, New York

Niren D. Saldanha

KPMG LLP

Chicago, Illinois

5:15-5:30pm New IPT Member Welcome Session

5:30-7:00pm Welcome Reception
Sponsored by: **Vertex Inc.**

THURSDAY, September 22

7:30-8:30am Continental Breakfast

8:30-10:30am **VAT Major Changes Around the Globe**

Over 160 countries around the globe employ a VAT, and these tend to be the primary instrument of fiscal and macroeconomic policy. In addition, the continuing move to a global, digital economy is raising significant issues for VAT compliance and management. In recent years a number of countries and regions have adopted significant changes in their VAT. This session will review some of the significant VAT developments around the globe over the last 12-18 months, including the adoption and nullification of VAT in Puerto Rico, the convergence of the VAT and business tax systems in China, potential adoption of VAT in India and the Middle East.

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

- Explain key characteristics of Chinese VAT vs Business Tax

THURSDAY, September 22 (cont.)

- Explain key characteristics of the potential India and Middle East VAT law
- Have a better understanding as to why Puerto Rico adopted/nullified their VAT law
- Identify key compliance trends and issues in VAT around the globe

Panel:

Christopher S. Hall, CMI

Ford Motor Company
Dearborn, Michigan

Robert S. Smith

Ernst & Young LLP
Irvine, California

Moderator:

Harley T. Duncan

KPMG LLP
Washington, DC

Major Changes Puerto Rico and British Exit from the European Union

Recent months have caused some upheaval in the VAT world. First, the Commonwealth of Puerto Rico adopted a VAT to replace the sales tax and then repealed the VAT law just days before it was to become effective. Then, in June 2016, British voters approved a ballot measure requiring the United Kingdom to withdraw from the European (Brexit) Union. While the timing and exact nature of the withdrawal are still subject to negotiation, what is clear is that the UK exit will have substantial ramifications for the UK VAT and sellers both within and without the UK.

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

- Identify the major drivers of the proposed Puerto Rican VAT and the reasons for its repeal
- Understand the key features of the proposed Puerto Rican VAT

THURSDAY, September 22 (cont.)

- Explain the key lessons learned by taxpayers in preparing to implement the VAT
- Understand the general ramifications of the Brexit for the VAT
- Identify the major changes that should be expected
- Discuss what the major changes mean for UK VAT compliance for both UK and non-UK sellers

Speakers:

Adam Raschke

Grant Thornton
London, UK

Karen Robb, CTA

Grant Thornton
London, UK

Kevin Todd

Microsoft Corporation
Redmond, Washington

Matthew S. Walsh, Esq.

Sovos Compliance
Wilmington, Massachusetts

Casper Winkelman

Sovos Compliance
Halfweg, Netherlands

Major Changes - China

There has been much change or proposed change in these countries. China has proceeded apace over the last few years to replace its Business Tax with a VAT, and all economic sectors are now subject to one of the most broadly-based VATs in the world. In addition, the states of the Gulf Cooperation Council are planning to implement a broad-based VAT in the near future, and the Egyptian government has proposed a major reform of its existing consumption tax.

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

THURSDAY, September 22 (cont.)

- Explain key characteristics of Chinese VAT vs Business Tax
- Explain key characteristics of the potential Gulf Cooperation Council VAT law
- Explain the key characteristics of the proposed Egyptian VAT reform
- Identify the primary compliance considerations associated with each of these countries

Speakers:

Robert S. Smith
Ernst & Young LLP
Irvine, California

10:30-11:00am Break

11:00-12:00pm **Other Major VAT Changes around the World**

The drive toward more complete transparency for tax compliance processes on the part of national governments is inexorable. Changes resulting from such initiatives seem to be continuous, are multi-dimensional, and have unique requirements and time-frames. This session will explore several of such trends impacting business processes and tax reporting obligations, and therefore time and investment by tax professionals and their companies.

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

- Understand the extent of new requirements for more and more information that must be provided nearly in real-time
- Identify some of the key elements of electronic invoicing rules and how to practically cope with them
- Explain the interdependencies created by new tax reporting obligations and the need to ensure data and privacy protection laws are followed
- Understand the scope of various changes proposed by the Organization for Economic Cooperation and Development (OECD)

THURSDAY, September 22 (cont.)

Speakers:

Ronnie Dassen

Deloitte Tax LLP
New York, New York

Karen Robb, CTA

Grant Thornton LLP
Euston Square, London

Philip Walton

Deloitte Tax LLP
Chicago, Illinois

12:00-1:15pm Lunch

Will VAT Ever Come to the US?

It is difficult to predict if the U.S. will adopt a VAT as part of its federal revenue structure. Still, there are several fiscal, economic and demographic trends, as well as a tremendous level of discussion regarding business tax reform, that keep hinting that there may be a role for a national consumption tax in the federal revenue structure. This session will review those trends and forces with a view toward their implications for the US adopting a national VAT.

Presentation 12:30-1:00pm

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

- Identify the key economic and demographic trends influencing the federal budget in the near and medium term
- Discuss the key drivers of business tax reform in the U.S.
- Formulate an opinion on whether the U.S. will adopt a VAT
- If the US adopts a VAT, how likely would it be that states adopt a state level VAT

Speaker:

Harley T. Duncan

KPMG LLP
Washington, DC

THURSDAY, September 22 (cont.)

1:15-2:30pm Breakout Sessions (*select one*)

Tax Ideas That Work For Both Sales & Use/VAT

As companies continue to move toward more centralized global management of the indirect tax function through consolidation of tax departments and/or consultants, the opportunity has evolved to find cost saving synergies in worldwide movement of goods and services for both supply chain (A/P) and sales (A/R) purposes. Furthermore, more companies are moving toward implementation of one worldwide tax determination software solution in conjunction with their ERP implementations/upgrades. Such consolidation and standardization puts more pressure on existing resources to review and ensure that their transaction tax solutions are making proper determinations at the transaction level detail, contracting and invoice terms detail that become ever more critical. This session discusses concepts and synergies that work for both sales and value added taxes and also discusses considerations for data drivers needed to make those concepts a reality.

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

- Understand concepts and planning considerations for sales and value added tax
- Understand how transactions can be sensitized for both tax types
- Discuss key data drivers required for transactions that take both tax types into consideration

Speakers:

Diego Cinquemani, CMI

Viacom Inc.
New York, New York

Loren L. Chumley

KPMG LLP
Nashville, Tennessee

E-Audit Trends in A VAT/SUT Environment

THURSDAY, September 22 (cont.)

This session will provide a review of the E-Audit legal frameworks in use across the globe, compare and contrast the various E-Audit approaches utilized within the regions and individual countries, practical implications for your ERP and reporting systems; and how is this issue being handled and solved day to day.

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

- Compare/Review E-Audit approaches across the globe
- Have a better understanding of the various E-Audit Legal Frameworks
- Understand how to adapt your systems and processes in preparation to comply with E-Audit requests

Speakers:

Mark Houtzager

US VAT, Inc.

Brooklyn, New York

Charles Maniace

Sovos Compliance

City, State

Casper Winkelman

Sovos Compliance

Halfweg, Netherlands

2:30-2:45pm Break

2:45-3:45pm **Managing Global VAT – What is the optimal VAT operating model?**

Many multinationals are looking to evaluate or restructure their VAT function to meet their business needs globally. What is the optimal VAT operating model? How many VAT resources are required to manage the company's key VAT risks and opportunities? What VAT activities can be outsourced and what should be performed in-house? If those VAT activities are performed in-house, should they be undertaken by a

THURSDAY, September 22 (cont.)

Shared Service Center (SSC) or Center of Excellence (CoE)? What technology solutions are needed to make it work? The key objective of this session is to share knowledge and experience about different VAT ways to structure the VAT functions and what to consider when evaluating its components.

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

- Understand different ways in which VAT related tasks such as compliance and beyond can be structured (e.g. outsourcing, in-house – SSC, CoE, etc.) in different parts of the world
- Learn the requirements and challenges related to placing VAT sensitive tasks / VAT function components in the SSC / CoE
- Understand the most recent trends and best practices in this area

Speakers:

Elzbieta Choina

Ernst & Young LLP
Chicago, Illinois

Colleen Freeburg, Esq.

General Motors Corporation
Detroit, Michigan

3:45-4:00pm Break

4:00-5:00pm Breakout Sessions (select one)

Distance Selling Thresholds and Remote Seller Considerations

This session will address the VAT registration, collection and credit requirements/opportunities of companies that sell and/or deliver to customers outside the United States, do not have a physical presence in the destination country and is not registered for VAT in that country. Such non-physical presence and unregistered companies may have a responsibility to collect and remit the VAT of the country that the goods or

THURSDAY, September 22 (cont.)

services are being delivered to. Furthermore, if the product being delivered is tangible personal property, the companies may be paying VAT upon importation with minimal to no opportunity of recovering the VAT paid.

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

- Identify general remote seller VAT registration and collection requirements for major jurisdictions such as the EU
- Grasp differences between requirements for sale and delivery of tpp and electronically delivered software and services
- Recognize Third-party drop shipment intricacies

Speakers:

Steve Patton

Ernst & Young LLP
New York, New York

Kevin Todd, CPA

Microsoft Corporation
Redmond, Washington

Zdenek Vajnlich

Meridian Global Services
Prague, Czech Republic

Creating and Managing Data Analytics

If your enterprise is like most multi-national companies, you grapple to make sense of a vast volume of transactional and financial data generated by your ERP systems. Unfortunately, ERP systems were not designed to give tax executives easy answers. They were not designed to analyze taxes or possess the functionality to assess and address compliance issues or identify potential cash-back opportunities.

Unlock the hidden value of your ERP data and use it to proactively manage tax, risk and compliance issues with certainty.

THURSDAY, September 22 (cont.)

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

- Identify data analytics tools
- Better transform tax data into insight
- Gain more certainty on invoices, returns and declarations
- Better identify overpaid or under-claimed tax
- Better reveal buried business opportunities

Speakers:

Frederick Baumer

KPMG LLP

New York City, New York

Sukumar Dutta

General Motors Corporation

Detroit, Michigan

Sue O'Donnell

General Motors Corporation

Oshawa, Ontario

5:30-7:00pm Reception

FRIDAY, September 23

7:30-8:30am Continental Breakfast

8:30-10:00am **Intersection of VAT, Customs and Income Tax for Supply Chain Optimization**

Businesses and governments continue to expand their objectives and capabilities for global supply chain visibility and optimization of cross-functional costs and compliance activities. In most large organizations, VAT, customs, income tax and transfer pricing functions are often managed through different teams and systems with limited holistic visibility. This session will help the VAT professional gain cross-functional perspectives and take action to help the organization optimize cross-border supply chain costs and compliance.

FRIDAY, September 23 (cont.)

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

- Gain insights to the key drivers and concerns of the different tax and customs functions
- Identify involvement and actions to drive value for the overall organization
- Explore technology developments and uses to help with optimization

Speakers:

Paula Borhauer, CMI, CPA

Starbucks Corporation
Seattle, Washington

Conny McCauley

Ernst & Young LLP
New York, New York

The Intersection of BEPS and VAT

Years in the making, the Organization for Economic Co-operation and Development (“OECD”) made known to its member-States the Base Erosion and Profit Shifting (“BEPS”) Action Items in the Fall of 2015 and the world took notice. Some of the recommended Actions touch the Value Added Tax (“VAT”) only tangentially but BEPS Action 1 hits VAT and the flourishing digital economy, squarely. We will analyze these points of contact and interpret how they will affect you.

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

- Learn about BEPS Actions items and their importance
- Analyze how BEPS Actions interact with VAT
- Analyze BEPS Action 1 and its effect on the digital economy

Speakers:

Paula Borhauer, CMI, CPA

Starbucks Corporation
Seattle, Washington

FRIDAY, September 23 (cont.)

Conny McCauley
Ernst & Young LLP
New York, New York

10:00-10:30am Break

10:30-12:00pm **Top 10 Ideas on How to Identify Saving Opportunities (VAT Recovery; Related Intercompany Transactions; How to Get Your Refunds and Do It Quickly)**

The objective of this session is to share best-practices for US-based multinationals regarding opportunities to reduce VAT leakage and improve both profitability and cash-flow, as well as minimizing the amount of tedious re-work that can be created when VAT transactions are not optimally implemented. Specific topics will include ways to structure transaction to avoid VAT where that is possible, discuss VAT recovery options in certain countries and situations including increased recovery time, and ensuring transactions are structured VAT efficiently to mitigate any permanent VAT costs.

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

- Know in which countries a non-registered US entity may file refund claims for VAT incurred by it in those countries
- Identify particular scenarios where it is possible to avoid a VAT charge, or at least defer a VAT charge to quicken recovery time
- Grasp what areas of the business are more prone to experience VAT problems that can be fruitful areas on which to focus VAT recovery efforts
- Know how arrangements can be restructured to mitigate any permanent VAT costs

Panel:
Les Baer
Meridian Global Services
White Plains, New York

FRIDAY, September 23 (cont.)**Michael Bugbee**

Federal-Mogul Corporation
Southfield, Michigan

Edel Flynn, CA

Ernst & Young LLP
New York, New York

Christopher S. Hall, CMI

Ford Motor Company
Dearborn, Michigan

12:00pm

Program concludes

Program Committee

Chair

Carlos V. Hernandez, CMI
Senior Manager
Ernst & Young LLP
Boston, Massachusetts

Vice-Chair

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

Paula Borhauer, CMI, CPA

Director, Indirect Tax
Starbucks Corporation
Seattle, Washington

Camilo Martinez, JD

Business Consultant
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Boston, Massachusetts

Shawn K. Carter, CPA

Senior Tax Manager
Baker Hughes, Inc.
Houston, TX

Adam Raschke

Senior Manager
Grant Thornton LLP
London, UK

Harley T. Duncan

Tax Managing Director
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Washington, DC

Zdenek Vajnlich

Senior International VAT Manager
Meridian Global Services
Prague, Czech Republic

Christopher S. Hall, CMI

Manager, Indirect Taxes
Ford Motor Company
Dearborn, Michigan

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GENERAL INFORMATION

REGISTRATION

The IPT [registration form](http://www.ipt.org) is available on IPT's website at 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 1:00 p.m. on Wednesday, September 21st.

There is an early-bird discount of \$50 off the normal registration fee if the form is submitted by the August 25th deadline. The fee structure is as follows for registrations received by the IPT Office:

	By August 25th	After August 25th
Individual Holds Membership in IPT:	\$495.00	\$545.00
Individual Not a Member but <i>Company has Members</i>	\$745.00	\$795.00

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

There is also a substitution charge of \$40 before August 25, 2016, 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 8, 2016, 5:00 pm EST. No refunds will be given after September 8, 2016.

Should you have any questions, please call 404-240-2300 or e-mail the Registrar, Toby Miller, at 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.

GENERAL INFORMATION

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 JW Marriott Indianapolis. Reserve your accommodations directly with the JW Marriott Indianapolis by using the hotel's special link:

<https://resweb.passkey.com/go/TaxSymposium>

and complete your online registration. IPT has a negotiated special Symposium room rate with the JW Marriott Indianapolis of \$209.00 plus tax for a single or \$229.00 plus tax for a double.

Accommodations requested after August 25, 2016, or sooner if the block sells out, cannot be ensured.

CONTINUING EDUCATION CREDIT

Approximately 15.5 CPE credits are available for full attendance Wednesday through Friday. Each attendee will be able to obtain 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 must verify individual attendance at sessions in order to grant continuing education credits. Each attendee's name badge has a unique barcode that identifies that individual. All current CMIs and CCIPs registered for the Symposium will have a special color-coded badge to signify the CMI or CCIP designation. In order to obtain CE credit, each individual must scan his or her bar-coded badge during the first 15 minutes of each session. No credit for the session will be given to un-scanned attendees. CMIs and CCIPs will receive hour-for-hour continuing education credits for actual session attendance.

A lost name badge should be reported immediately, or at the break, to the registration desk in order to obtain a replacement.

GENERAL INFORMATION

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IPT files a Continuing Legal Education (CLE) application with the state in which the program is held. Any fee imposed by an individual state (Texas) based on an individual's credit hours is the responsibility of the individual.

Prerequisites: None
Program Level: Overview of Timely Value Added Tax Issues
NASBA Field of Study: Taxes
Instructional Method: Group Live
Advanced Preparation: None

SYMPOSIUM MATERIALS

Approximately one week prior to the program, speaker presentation materials 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 2016 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.



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