

Achieving International Corporate Tax Certainty in an Uncertain Tax Environment

5 February 2026: Mohammed Bin Rashid Library - Auditorium

PROGRAM

8.00 – 8.30 Registration and welcome coffee

8.30 – 8.45 Welcome remarks

- ITLRN Representative: Prof. Dr. Vikram Chand, University of Lausanne, Switzerland / Government Advisor / Independent Expert on International Tax Dispute Management (conference chair)
- Main event host: H.E, Abdulrahman Saleh Al Saleh, Director General, Department of Finance, Dubai
- Main event partners: Alex Law, Partner, Deloitte UAE and James Anderson, Partner, Skadden, UK

Part 1 : UAE and Global developments

Session Chair / Moderator : Prof. Dr. Vikram Chand

8.45 – 9.00 Key note Speech

- H.E, Mr. Khalid Ali Al Bustani, Director General Federal Tax Authority, UAE*

9.00 – 9.45 Panel Discussion with

- Abdulaziz Mohammed Al Mulla, Commissioner for Tax Affairs, DoF Dubai
- Shabana Begum, Executive Director - Tax Policy Sector at the UAE Ministry of Finance
- Ridha Hamzaoui, Tax Policy Senior Expert, Federal Tax Authority
- Dr. Achim Pross, Deputy Director, Centre for Tax Policy and Administration, OECD

9.45 – 9.55 Setting the scene

- Prof. Dr. Svetislav Kostic, University of Belgrade, Serbia

9.55 – 10.55 Panel 1: Transfer Pricing related Tax Audit and Dispute trends

Moderator: Dr. Stefano Simontacchi, Partner, BonelliErede, Italy

- Manuel De Los Santos Poveda, Head of Transfer Pricing Unit, OECD
- Daniel Prates, Competent Authority Leader, Brazil
- Nauryzbek Abduokhapov, Senior expert at Transfer Pricing division of Specialised department of the State Revenue Committee of Republic of Kazakhstan
- Fachrizal Septian, APA/MAP Competent Authority Delegate and Negotiator, Indonesia
- Siegert Slagman, Global Tax Vice-President, Japan Tobacco International, Switzerland

Panel Coordinator: Karen Hernandez Leon, Deloitte

10.55 – 11.10 Coffee break

11.10 – 12.10 Panel 2: Tax Treaty related Tax Audit and Dispute trends

Moderators: Mukesh Butani, BMR Legal, India and Marco Adda, Partner, BonelliErede, Italy

- Carlos Protto, Director of International Tax Relations, Ministry of Economy, Argentina
- Pitambar Das, Joint Secretary and Director, Tax Policy, Income Tax Department, Government of India, India
- Amir Zainuddin Bin Abdul Hamid, Director, MAP Division, Department of International Taxation, Inland Revenue Board of Malaysia
- Robbie Bañaga, Chief, International Tax Affairs Division, Bureau of Internal Revenue, Philippines
- Julian Valverde, Group Head of Tax, Sidara, UAE

Panel Coordinator: Karen Hernandez Leon, Deloitte

12:10 – 13.10 Panel 3: QDMTTs and Tax Incentives in light of the SBS package and potential dispute areas

Moderator: Jan Van Abbe Roderick, Partner, Deloitte UAE

- Melanie Dewi Astuti, Senior International Tax Analyst, Fiscal Policy Agency Ministry of Finance, Indonesia (and lead for Pillar II implementation)
- Intouch Piyanawin, Legal Officer at the Revenue Department, Thailand (and lead for Pillar II implementation)
- Francesco Bungaro, Pillar 2 Leader, EU Commission
- Javaad Khan, Global Head of Tax, Emirates
- Sebastian Bock, Vice President Finance at the Investment Corporation of Dubai (ICD)

Panel Coordinator: Karen Hernandez Leon, Deloitte

13.10 – 14.00 Lunch

Part 3 : Preventing and Resolving International Corporate Tax Disputes

14.00 – 14.10 Setting the scene

- Prof. Dr. Paolo Arginelli, Università Cattolica del Sacro Cuore / Partner, Pirola Pennuto Zei, Italy

14.10 – 14.55 Panel 4: Policy Makers Perspective : Recent updates on preventing and resolving international tax controversies

Moderator: Joe Duffy, Partner, Matheson, Ireland

- Sriram Govind, Acting Co-Head of Tax Certainty Unit, OECD, France
- Khairilia Basrah Kadir, Competent Authority Delegate and Negotiator, Indonesia

Panel Coordinator: Camille Tirand, UNIL

14:55 – 15.45 Panel 5: Preventing transfer pricing disputes – Practical experience / perspectives on APAs and other tools for Transfer Pricing

Moderator: David Farhat, Partner, Tax, Skadden, USA

- Mekar Satria Utama, Director, Directorate of International Tax, DGT; Indonesia
- Jean Ussel, Mexican International Transfer Pricing Expert, Mexico
- Dominic Vines, Team leader of HMRC's Transfer Pricing (Competent Authority) team, United Kingdom
- Avni Dika, Global Head of Transfer Pricing, Syngenta Group, Switzerland

Panel Coordinator: Camille Tirand, UNIL

15.45 – 16.00 Coffee Break

16:00 – 16.50 Panel 6: Resolving transfer pricing disputes – Practical experience / perspectives on MAPs and Arbitration for Transfer Pricing

***Moderators: David Farhat, Partner, Tax, Skadden, USA
and Joan Hortalà, Partner Cuatrecasas, Spain***

- Mekar Satria Utama, Director, Directorate of International Tax, DGT; Indonesia
- Jean Ussel, Mexican International Transfer Pricing Expert, Mexico
- Dominic Vines, Team leader of HMRC's Transfer Pricing (Competent Authority) team, United Kingdom
- Vineet Rachh, Vice President, Asia Pacific, Middle East and Africa Tax, Procter & Gamble, Singapore
- Sebastiaan De Buck, Global Head of Tax, Unilever, Netherlands

Panel Coordinator: Camille Tirand, UNIL

16:50 – 17.50 Panel 7: Preventing and resolving tax treaty disputes and broader international tax disputes – Practical perspective and future outlook

Moderators: Juliana Candido Campos, Senior Tax Studies and Reports Expert, DOF and Kinga Romanovska, Independent Expert on International Tax

- Faycal Abdoulaye, Chief of Tax Legislation, Cameroun
- Sarah Belgareh, Head, MAP division, Morocco
- Alpha Ngom, Senior International Tax Advisor, Senegal – Chairperson of the Cross Border Taxation Technical Committee, ATAF
- Kashif Jahangiri, Partner and Tax Leader, Deloitte Saudi Arabia

Panel Coordinator: Camille Tirand, UNIL

17.50 – 18.00 Closing remarks

- Prof. Dr. Vikram Chand

*Please note that this is an almost finalized agenda. While majority of the speakers have confirmed their participation, the final agenda, depending on the availability of the speakers, could look different. Other speakers could also be added at a later stage.