

**TURKISH INDUSTRY & BUSINESS ASSOCIATION (TUSIAD)
&
INTERNATIONAL FISCAL ASSOCIATION TURKEY**

**INTERNATIONAL TAX CONFERENCE
PROGRAM**

**CURRENT DEVELOPMENTS IN INTERNATIONAL TAXATION
26 APRIL 2019
TEKFEN TOWERS CONFERENCE ROOM**

- 09.00 - 09.30 Opening of the Conference
- First Session (09.30 - 11.00)**
DEVELOPMENTS IN INTERNATIONAL TAX POLICY
- Moderator: Erdal Çalikoğlu, EY Turkey, Partner, Tax Leader**
- 09.30 - 09.50 Changes and Expectations in International Tax Policy in the Post-BEPS Era
David Bradbury, OECD, Centre for Tax Policy and Administration Head of the Tax Policy and Statistics Division
- 09.50 - 10.10 Changes and Expectations in Turkish Tax Policy in the Post-BEPS Era
İdris Şenyurt, Turkish Tax Revenue Administration, Head of International Relations and European Union Directorate
- 10.10 - 10.30 Observations and Critics on the International Tax Policy of BEPS
Assoc. Prof. Dr. Irma Johanna Mosquera Valderrama, Leiden University, Faculty of Law
- 10.30 - 10.45 Discussion
- 10.45 - 11.15 Coffee Break
- Second Session (11.15 - 13.00)**
DEVELOPMENTS IN INTERNATIONAL TAX PRACTICES
- Moderator: Leon Aslan Coşkun, Mazars Denge, Partner, Head of the Executive Board**
- 11.15 - 11.35 Digital Permanent Establishments: National and International Developments
Ezgi Türkmen, PriceWaterhouseCoopers, Partner
- 11.35 - 11.55 Anti-Tax Avoidance Developments in Europe
Christain Kaiser, Head of Tax of Siemens and Head of IFA Germany
- 11.55 - 12.15 Tax Transparency: Developments in Information Exchange
Abdülkadir Kahraman, EY Turkey, Partner
- 12.15-12.35 Transfer Pricing Reporting: Possible Impacts and Risk Analysis
Gökçe Gücüyener, Mazars Denge, Partner, Transfer Pricing Leader
- 12.35 - 13.00 Discussion
- 13.00 - 14.00 Lunch
- Third Session (14.00 - 15.15)**
DEVELOPMENTS in INTERNATIONAL TAX TREATIES: MULTILATERAL INSTRUMENT (MLI)
- Moderator: Şaban Erdikler, KPMG, Partner, Tax Leader**
- 14.00 - 14.20 General Remarks on the MLI
Prof. Dr. Scott Wilkie, Blake, Cassels & Graydon LLP Partner, IFA Permanent Scientific Committee Vice President
- 14.20 - 14.40 Turkish Approach to the MLI
Ahmet Kurt, Turkish Tax Revenue Administration, International Relations and European Union Directorate
- 14.40 - 15.00 Functioning of the MLI
Assist. Prof. Dr. Selçuk Özgenç, Sakarya University, Faculty of Law
- 15.00 - 15.15 Discussion
- 15.15 - 15.45 Coffee Break

Fourth Session (15.45 - 17.00)

SPECIFIC PROVISIONS OF THE MLI AFFECTING TURKISH TAX TREATIES

- Moderator: Hülya Yılmaz, Deloitte, Partner, International Tax and Transfer Pricing Leader**
- 15.45 - 16.05 Reservations
Prof. Dr. Leyla Ateş, Altınbaş University, Faculty of Law
- 16.05 - 16.25 Principal Purpose Test Provision
Prof. Dr. Billur Yaltı, Koç University, Faculty of Law
- 16.25 - 16.45 Permanent Establishment Provision
Assist. Prof. Dr. Ertuğrul Akcaoğlu, Hacettepe University, Faculty of Law
- 16.45 - 17.00 Discussion
- 17.00 Closing of the Conference
- 17.30 - 19.30 Cocktail