PCT Launch Workshop:

The Toolkit on Tax Treaty Negotiations

PROGRAM

March 11, 12 & 15, 2021
9:00 AM – 12:00 PM ET
### DAY 1 – THURSDAY, MARCH 11, 2021

<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
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<tbody>
<tr>
<td>9:00-9:05 AM ET</td>
<td>Introductory Remarks &amp; Housekeeping Rules by the Master of Ceremonies</td>
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<td>9:05-9:10 AM ET</td>
<td>Welcoming Remarks</td>
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<td>Mr. Pascal Saint-Amans, <em>Chair of The Platform for Collaboration on Tax &amp; Director of the Center for Tax Policy and Administration (CTPA), OECD</em></td>
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<td>9:10-10:15 AM ET</td>
<td>First Session – Launching the Toolkit</td>
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<td>• Presentation of the toolkit, overview of the public feedback, review of some available tools &amp; comments on the future of the toolkit (by emphasizing its dynamic nature) (35 min)</td>
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<td>• Demo of the web-based toolkit and the e-learning module by the PCT Secretariat (15 min)</td>
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<td>• Q&amp;A with the audience (15 min)</td>
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<td>10:15-10:30 AM ET</td>
<td>BREAK (15 min)</td>
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<td>10:30-11:45 AM ET</td>
<td>Second Session – Designing a tax treaty policy framework and country’s model</td>
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<td>• Relevant information to determine each country’s needs and priorities in a tax treaty negotiation</td>
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<td><strong>Moderator:</strong> Mr. Cory Hillier, <em>Senior Counsel (Tax Law), IMF</em></td>
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DAY 2 – FRIDAY, MARCH 12, 2021

9:00-9:05 AM ET  Introductory Remarks & Housekeeping Rules by the MC

9:05-9:10 AM ET  Welcoming Remarks

Mr. Navid Hanif, Director, Financing for Sustainable Development Office, United Nations

9:10-10:15 AM ET  Fourth Session – Preparing for a negotiation

• Identifying risks and drafting provisions to deal with them

Moderator:
Ms. Sophie Chatel, Head of Tax Treaty Unit, CTPA, OECD

Speakers:
Mr. Norbert Roller, Consultant, World Bank
Ms. Stephanie Smith, Senior Director, Tax Treaties, Department of Finance, Canada
Ms. Marlene Nembhard Parker, Chief Tax Counsel, Legislation, Treaties and International Tax Matters, Master of Finance, Jamaica

10:15-10:30 AM ET  BREAK (15 Min)

10:30-10:50 AM ET  Q&A with the audience (20 min)
10:50-11:40 AM ET  Fifth Session – Presentation of IBFD Tax Treaty Database

Speakers: Jan de Goede, Bart Kosters and Pavel Grishunin

11:40-11:55 AM ET  Q&A with the audience (15 min)

11:55 AM-12:00 PM ET  Concluding remarks & summary of discussions by the MC

DAY 3 – MONDAY, MARCH 15, 2021

(Daylight Savings Time starts in North America on March 14, 2021. Please check your local time before joining the meeting)

9:00-9:05 AM ET  Welcoming Remarks & Housekeeping Rules by the MC

9:05-10:15 AM ET  Sixth Session – Conduct of negotiations

- Practical considerations for agreeing on a “fair” withholding tax limitation

Moderator:
Ms. Patricia Ann Brown, Inter-Regional Adviser on Tax Matters, UN

Speakers:
Mr. Eric M. Zolt, Professor of Law, UCLA
Mr. Carlos Protto, Director of International Tax Relations, Ministry of Treasury, Argentina
Mr. Armando Lara, Consultant, World Bank
Mr. John Stokes, Senior Policy Adviser, Tax Treaty Team, HMRC, UK

10:15-10:30 AM ET  BREAK (15 min)

10:30-10:50 AM ET  Q&A with the audience (20 min)

10:50-11:40 AM ET  Seventh Session – Presentation of Tax Analysts’ Tax Treaty Database

Speakers: Peter Billingsley, Larissa Hoagland, Linda Friedman

11:40-11:55 AM ET  Q&A with the audience (15 min)

11:55 AM-12:00 PM ET  Concluding remarks & summary of discussions by the MC