

# UN Webinar on Transfer Pricing Aspects of Financial Transactions

## Tentative Agenda

<b>DATE: 25 MARCH 2021</b>	
<b>OPENING AND INTRODUCTION</b>	
<b>8:00 – 8:15</b>	<b>Welcoming remarks and introduction</b>  Navid Hanif, Director, Financing for Sustainable Development Office, Department of Economic and Social Affairs (FSDO/DESA)  Michael Lennard, FSDO/DESA, Secretary, UN Committee of Experts on International Cooperation in Tax Matters
<b>THE NEW FINANCIAL TRANSACTIONS CHAPTER OF THE UN TRANSFER PRICING MANUAL</b> <b>Objective:</b> Financial transactions are an important part of financing MNEs' operations and, ultimately, support value creation. Members of an MNE Group, however, are not subject to the market forces that would otherwise guide the setting of prices between transactions partners, posing a potential risk that those transactions may not be priced in accordance with the arm's length principle. As such, many countries have introduced transfer pricing legislation to address this issue. The Transfer Pricing Manual aims to give practical guidance on how to address transfer pricing considerations of financial transactions with a special view to developing countries. In this regard, this session aims at getting an overview of the new chapter on financial transactions in the update of the UN Practical Manual on Transfer Pricing for Developing Countries, as approved by the UN Tax Committee.	
<b>8:15 – 9:40</b>	<b>The new financial transactions chapter of the UN Transfer Pricing Manual</b> <b>Chair/ Facilitator:</b> Farid Hasnaoui, UNDESA <b>Presenters:</b> Monique van Herksen, Partner, Simmons & Simmons LLP/ UN Transfer Pricing Subcommittee; Raffaele Petruzzi, Managing Director, WU Transfer Pricing Center, Vienna University of Economic and Business/ UN Transfer Pricing Subcommittee <b>Discussants:</b> Riva Jalipa, Public Policy Analyst and Advocacy Strategist, Oxfam International; Ingela Willfors, Director at Tax and Customs Department, International Tax, Swedish Ministry of Finance/ Co-coordinator of the UN Transfer Pricing Subcommittee/ UN Tax Committee; Manuel de los Santos, Advisor, Transfer Pricing Unit, Centre for Tax Policy and Administration, OECD <b>Q&amp;A</b>
<b>Expected outcome:</b> At this introductory session, participants should have a better picture of what is covered in the new guidance on financial transactions put forward on the 2021 update of the UN Transfer Pricing Manual.	

9:40 – 9:50	<b>Virtual Coffee break</b>
<p><b>PRACTICAL ASPECTS OF THE NEW GUIDANCE FOR TAX ADMINISTRATIONS AND BUSINESSES</b></p> <p><b>Objective:</b> Discuss how the new guidance can be applied in practice to the issues faced by tax administrations and businesses in developing countries. This session will also consider potential issues faced in the context of the COVID-19 pandemic.</p>	
9:50 – 11:20	<p><b>Practical aspects of the new guidance for tax administrations and businesses</b></p> <p><b>Chair/ Facilitator:</b> Ilka Ritter, UNDESA</p> <p><b>Presenters:</b> Marcos Aurélio Pereira Valadão, Professor of Tax Law at Fundação Getulio Vargas/ UN Transfer Pricing Subcommittee; Richard Goldberg, International Tax and Transfer Pricing Consultant, RG Transfer Pricing Solutions LLC</p> <p><b>Discussants:</b> Nishana Gosai, Group Tax Executive, Adcorp; Stig Sollund, Director, International Tax, Norway/ Co-coordinator of the UN Transfer Pricing Subcommittee</p> <p><b>Q&amp;A</b></p>
<p><b>Expected outcome:</b></p> <p>Participants should be able to have a better understanding of how the new guidance can help countries to effectively address the practical issues encountered in this area, both from a business and tax administration’s perspectives.</p>	
<p><b>WAY FORWARD AND CLOSE</b></p> <p><b>Objective:</b> This session will provide closing remarks on the event. Participants are also reminded to take the survey aimed at collecting inputs on how UNDESA can further assist developing countries in their efforts to find solutions to current and emerging issues in tax policy and administration.</p>	
11:20 – 11:30	<p><b>Close of Webinar and Way Forward</b></p> <p>Michael Lennard, UNDESA</p>