

# **International Corporate Tax Symposium 2022**

**U.S., OECD, EU, Switzerland:  
International Taxation: Quo Vadis?**

**Zurich, September 16, 2022**

**08:00 - 17:00**

**Swiss Re Centre for Global Dialogue,  
Rüschlikon**

(virtual attendance possible)

## **Moderator:**

Dr. Peter Altenburger, Founding Member and Counsel,  
Altenburger Ltd legal + tax, Kusnacht

## **Speakers in alphabetical order:**

Fabian Baumer, Vice-Director, Head of Tax Policy, Federal Tax Administration, Berne

Representative Don Beyer (D-Virginia), member of the US House of Representatives,  
Chair of US Congress' Joint Economic Commission, former US Ambassador to  
Switzerland and Liechtenstein, Alexandria, Virginia

Joseph Czajkowski, former Senior Tax Counsel, Exxon Mobil Corporation, Texas

Marlies de Rooter, Partner at EY, Global International Tax Policy Leader, Rotterdam

Peter Eisenring, Head of Group Tax and Insurance, Roche, Basel

Dr. Markus Frank Huber, Partner Tax, MLL Legal, former Head of European Tax,  
Biogen International GmbH, Baar

Prof. Dr. René Matteotti, Professor of Law, Chair in Swiss, European and International  
Tax Law, University of Zurich, Zurich. Attorney at law, Tax Partner AG, Zurich

John Peterson, Head of Unit - GloBE (Pillar Two), OECD

Prof. Dr. Ekkehart Reimer, Chair for Public Law, European and International Tax Law,  
University of Heidelberg (Germany).

Dr. Andreas Risi, Managing Director, Head of Tax Switzerland, UBS, Zurich

H. David Rosenbloom, Director of the International Tax Program of NYU Law School  
and Partner of Caplin & Drysdale, Washington D.C.

Nicola Sartori, Vice Director of the Law School and Associate Professor in Tax Law,  
University of Milano Bicocca

Robert Stack, Managing Director, Washington National & International Tax, Deloitte  
(former Deputy Assistant Secretary for International Tax Affairs at the U.S. Department  
of Treasury), Washington D.C

Jan-Paul Vestering, Head of Group Transfer Pricing & Business Models, Nestlé, Vevey

Charlotte Winzer, Vice President International Tax Operations, P&G, Frankfurt

## **Program**

- 08:00 Registration of guests - welcome coffee  
08:30 Welcome / Introduction by Peter A. Altenburger

### **OECD**

- 08:40 John Peterson: Pillar One and Pillar Two: Where do we stand?  
(via video)  
09:10 Marlies de Ruiter: Pillar 1 and Pillar 2: What does it mean for the concerned companies?

### **EU: Levelling the Playing Field?**

- 09:40 Prof. Ekkehart Reimer: Compatibility of the OECD's Pillar Two Release of December 20, 2021, with the EU Freedom of Establishment  
10:10 Nicola Sartori: Will the Digital Sales Tax (DST) survive the implementation of the OECD Pillar Two taxation?  
10:40 Coffee break

### **Switzerland: Where will the tax changes in the U.S. and the OECD lead Switzerland to?**

- 11:10 René Matteotti: Implementation of Pillar 2 in Switzerland: Selected Issues from an Academic Point of View

### **US Congress: What is the path forward?**

- 11:40 Joe Czajkowski: GILTI and foreign tax offset, including proposed changes  
12:10 Lunch break (buffet lunch)  
13:00 Rep. Don Beyer (D, Virginia): The Byzantine Journey of US Tax Policy in 2021/ 22 (via video)  
13:30 H. David Rosenbloom: GILTI, BEAT, FDII and other U.S. acronyms (via video)  
14:00 Robert Stack: Will the U.S. make the life of companies based in Europe/ Switzerland miserable? (via video)  
14:30 Coffee break

### **Switzerland: Impact of tax development on Location Switzerland**

- 15:00 Fabian Baumer: General overview  
15:30 Impact for Swiss companies: Losing Competitiveness?
  - Peter Eisenring, Roche
  - Jan-Paul Vestering, Nestlé
  - Andreas Risi, UBS

16:15 Impact on Swiss HQs of US quoted companies: The Big Escape?
  - Dr. Markus F. Huber, Partner Tax, MLL Legal, former Biogen
  - Charlotte Winzer, Procter & Gamble

### **17:00 Closing Remarks**

**Content / Goals of Seminar:**

With decisive changes in US taxation, agreement on a two-pillar solution at the OECD and the Inclusive Framework countries to address digitalization of the economy, Unilateral Digital Service Taxation and many changes in tax legislation around the world, the fiscal environment looks erratic and unpredictable. Who will win, and who will lose? What are the macro-economic consequences for involved countries? And what surprises lurk just beyond the horizon?

These and many other questions will be discussed by eminent experts from the U.S., the OECD, the EU, and Switzerland. Participants will come out of this seminar with a better understanding of the global fiscal landscape, more knowledge about the facts – and certainly a better grip on the key questions.

**Target Group:**

- Senior tax advisers
- Senior tax professionals of international companies
- Senior representatives of the tax service providers
- Representatives from federal, cantonal and communal fiscal authorities

**Pricing for physical participation:**

- Members: CHF 950 (incl. 7.7% VAT)
- Non-Members: CHF 1,200 (incl. 7.7% VAT)

Prepayment is required. Fee includes material, coffee break, lunch break and cocktails.

**Pricing for virtual participation:**

- Members: CHF 450 (incl. 7.7% VAT)
- Non-Members: CHF 600 (incl. 7.7% VAT)

Prepayment is required. Fee includes material.

**Registration:**

Online registration is available on [www.amcham.ch/events/event-program](http://www.amcham.ch/events/event-program)

Registration will be confirmed by e-mail and is considered final unless cancelled in writing (e-mail).

Registration deadline: September 2, 2022.

Cancellation deadline: September 13, 2022. After this date, the full price will be charged as a no-show fee. Attendee replacements are welcome.

**Administration:**

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