



You are invited to the Swiss Amcham's

# International Corporate Tax Symposium 2023

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

November 7, 2023

08:00 - 17:00

Swiss Re Centre for Global Dialogue, Rüslikon

(virtual attendance possible)

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## Moderator

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

## Speakers in alphabetical order

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

Kenneth A. Bransom, International Tax Professional, Partner, Hitchcock & Partner, Zurich

Prof. Dr. Robert Danon, Professor of Law, Director Tax Policy Center, University of Lausanne, Partner, Danon, Lausanne

Marlies de Ruiter, Partner, 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. Georg Kofler, LLM (NYU), WU Vienna

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

James Parent, Senior Vice-President, Head of Group Tax, Nestlé, Vevey

John Peterson, Acting Head of Division - Centre for Tax Policy and Administration, OECD

Tamara Pfammatter, Director, Federal Tax Administration, Bern

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

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.

Jason Yen, Principal, International Tax & Transaction Services, EY US (former Associate International Tax Counsel at US Department of the Treasury), Washington D.C.

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## Program

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

## OECD

- 08:40 John Peterson: Changes to the International Tax Framework as a result of the Global Minimum Tax  
09:10 Robert Danon: The future of dispute prevention and resolution: from MAP, to tax and investment treaty arbitration through the Global Minimum Tax world  
09:40 Marlies de Ruiter: OECD/EU: The Interaction between OECD and EU Tax Policies on the Two Pillars and Beyond  
10:10 Coffee break

## EU: Levelling the Playing Field?

- 10:40 Georg Kofler: An Overview on the EU's Global Minimum Taxation Directive (Directive (EU) 2022/2523)  
11:10 Nicola Sartori: Pillar 1 and the Spread of Digital Service Taxes: A Comparative Analysis

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

- 11:40 Tamara Pfammatter: General overview  
12:10 René Matteotti: Implementation of Pillar 2 in Switzerland: Selected Issues from an Academic Point of View  
12:40 Lunch break (buffet lunch)

## US Congress: What is the path forward?

- 13:30 Rep. Don Beyer (D, Virginia): US Tax Policy in the Coming Two Years (via video)  
14:00 Robert Stack (via video) and Jason Yen (present): Pillar 2 and the United States: Past, Present and Future  
14:45 Coffee break

## Impact on Swiss-based companies

- 15:15 Impact for Swiss companies: Losing Competitiveness?
  - Peter Eisenring, Roche
  - James Parent, Nestlé
  - Andreas Risi, UBS

16:00 Switzerland in or out for OUS Headquarters?
  - Dr. Markus F. Huber, MLL Legal, former Biogen
  - Kenneth A. Bransom, Hitchcock & Partner

## 16:45 Closing Remarks

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

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

## Pricing for virtual participation

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

Prepayment required. Fee includes material.

## Registration

Register for physical participation [here](#)

Register for virtual participation [here](#)

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

Registration deadline: October 20, 2023

Cancellation deadline: October 30, 2023

After this date, the full price will be charged as a no-show fee. Attendee replacements are welcome.

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