

International Tax Impacts of COVID-19

05.20.20

Multinational companies, like all others, are faced with significant challenges to their operations and supply chains as a result of the profound impact of COVID-19. As governments turn to tax provisions to alleviate some of the economic challenges, shelter-in-place/quarantine measures have various consequential ramifications on tax and transfer pricing considerations.

- Have you created an unintended taxable presence in a country resulting from remote workforces?
- Would adjusting intercompany payments to support cash-flow challenges lead to transfer pricing adjustments by tax authorities?
- Are the compliance filings or other reporting obligations impacted by these developments?
- What are best practices to navigate the uncertainty with these and other tax and transfer pricing challenges?

Join an international panel of specialists representing perspectives from the United States, Canada, United Kingdom, France, Spain, and the Netherlands, as we discuss relevant considerations and best practices to help you manage exposure to risk on tax and transfer pricing matters.

Date: Wednesday, May 20, 2020

Time:

8:00 a.m. - 9:15 a.m. PT – Presentation

9:15 a.m. - 9:30 a.m. PT – Q&A with Panel

Location: Online Webinar

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Panel:



Javier Salinas, BPM

Javier is a distinguished international tax lawyer and advisor. Clients rely on Javier, when navigating complex cross-border tax planning and structuring multinational operations. His clients range from startups to global, multinational companies in a wide spectrum of industries, including technology, blockchain and digital assets, e-commerce, FinTech, life science, manufacturing and distribution. Javier's unique perspective and expertise derives from his experience working with companies in major markets throughout the country and his background working with premier tax offices and agencies of the Federal Government in Washington, D.C. Javier identifies the relevant tax considerations and presents well-reasoned positions and alternatives to allow companies to make well-informed strategic decisions while considering the tax impact to operations and the company's success.



Sven Jost, BPM

Sven is a passionate economist and BPM's Transfer Pricing Practice Leader and Economic Consult Practice Co-leader. He is an ambitious, proven leader with nearly 15 years of professional experience both in-house and in public accounting. When serving his clients, Sven believes in a pragmatic, data-driven, yet hands-on approach, taking into consideration the business and operational needs of his clients and their stakeholders. Sven specializes in transfer pricing planning, documentation and implementation, value chain analyses, intellectual property and legal entity valuation, cost sharing arrangements and audits. Sven is a Ph.D. economist with in-depth knowledge of economic concepts and comprehensive understanding of financial chains.



Frank Van Hulsen, BPM

Frank has over 25 years of experience in International tax matters gained in both the US and Europe. As an international tax advisor, Frank has extensive experience in structuring international operations, including IP related planning. In addition, Frank has advised large multinationals, private equity funds and start-ups in achieving the most tax efficient operational structures including holding and finance plans and M&A transactions. Frank has extensive knowledge and practical experience with the impact of BEPS related matters, including the impact of these regulations within the various European jurisdictions and EU directives.



Sheena Bassani, Barsalou Lawson Rheault

Sheena joined Barsalou Lawson Rheault in 2010. Her practice focuses on international tax and transfer pricing. After working in the financial services sector in Paris, Sheena spent ten years at two global leading professional services firms where she worked exclusively on international tax and transfer pricing matters. During that time, she was called upon to manage complex transfer pricing files from a planning/documentation, implementation and dispute resolution viewpoint. Sheena holds a Bachelor of Civil Law (B.C.L.) and a Bachelor of Common Law (LL.B.) from McGill University. She has been a member of the Quebec Bar Association since 2000 and was a member of the Paris Bar for 14 years.

**Sébastien Rheault, Barsalou Lawson Rheault**

Sébastien (LL.L., cum laude, Dean's List; MBA) is a partner with Barsalou Lawson Rheault. He has 20 years of experience in transfer pricing and tax controversy. He mostly represents Canadian, U.S. and European multinational corporations on audit, at the Competent Authority level in the context of Advance Pricing Arrangements (APA) and Mutual Agreement Procedures (MAP) at the Canada Revenue Agency and Revenue Quebec's Appeals Branches, as well as before federal (Tax Court of Canada, Federal Court, Federal Court of Appeal) and provincial courts. Sébastien also advises on various corporate tax matters including transfer pricing, tax incentives (SR&ED credits, e-business), non-resident trust rules, Canada's income tax conventions, the General Anti-avoidance Rule (GAAR), corporate restructuring, as well as mergers and acquisitions. He is a member of the Law Society of Ontario and the Quebec Bar.

**Laurent Dommergues, GMBA**

Laurent is an attorney member of the Madrid Bar Association and a former member of the Paris Bar Association. He specializes in Direct and Indirect International taxation of companies and has a special expertise in the field of VAT. Laurent advises medium and large sized International companies operating in a wide range of industry and service sectors. He represents and defends his clients in tax disputes with the tax authorities. Before joining GMBA, Laurent was a Senior Manager at Ryan VAT Systems, a tax compliance and advisory firm. Beforehand, he ran his own practice as a Tax Attorney.

**Steve Jacob, Wilkins Kennedy**

Steve has over 25 years of experience advising companies and shareholders. After graduating from Cambridge University, Steve trained at Arthur Andersen and qualified in 1998. After working at another mid-tier firm for 10 years, leading that firm's relationship with its US affiliate, Steve joined Wilkins Kennedy as a Partner in 2017. He specializes in UK and international tax scenarios. Steve combines a special transaction-based acquisition and holding structures (particularly US investment into the UK), with tax compliance and relationships. Steve's particular speciality includes cross-border intercompany tax arrangements (Transfer Pricing, withholding taxes and interest/financing).

**Andreu Bové Boyd, Bové Montero y Asociados**

Andreu is a Senior Tax Associate at Bové Montero y Asociados, a Spanish accounting Firm that was founded 42 years ago, where his main focus is to advise MNEs and private clients in their domestic and international tax matters. He began his career as a tax lawyer at Cuatrecasas, assisting MNEs and family businesses in their corporate and private tax matters and later on in an international tax law firm in Switzerland with a strong focus on HNWI, where he gained significant experience in cross-border wealth and estate planning and international M&A deals. Andreu holds a double degree in Business and Law and an LLM in Taxation.