Searching for Certainty in an Uncertain World

Exploring new directions in the world of tax

2018 Financial Services Tax Conference
July 19, 2018
Notices

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The information contained herein is of a general nature and based on authorities that are subject to change. Applicability of the information to specific situations should be determined through consultation with your tax adviser.
Agenda

01  An Uncertain World
    – Tax Reform
    – BEPS Developments
    – Audit / Controversy Landscape

02  Paths to Certainty
# Today’s presenters

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<th>Title</th>
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<th>Company</th>
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<tbody>
<tr>
<td>Burcin Nee</td>
<td>Principal, Economic &amp; Valuation Services</td>
<td>KPMG LLP</td>
<td></td>
<td><a href="mailto:bnee@kpmg.com">bnee@kpmg.com</a></td>
</tr>
<tr>
<td>Brian Forschino</td>
<td>Head of Tax Regional Americas</td>
<td>UBS AG</td>
<td></td>
<td><a href="mailto:brian.forschino@ubs.com">brian.forschino@ubs.com</a></td>
</tr>
<tr>
<td>Felicia Chia</td>
<td>Partner, Transfer Pricing</td>
<td>KPMG Singapore</td>
<td></td>
<td><a href="mailto:fchia@kpmg.com.sg">fchia@kpmg.com.sg</a></td>
</tr>
<tr>
<td>Graeme Webster</td>
<td>Director, Transfer Pricing</td>
<td>KPMG in the UK</td>
<td></td>
<td><a href="mailto:graeme.webster@kpmg.co.uk">graeme.webster@kpmg.co.uk</a></td>
</tr>
<tr>
<td>Maggie Fritz</td>
<td>Principal, Economic &amp; Valuation Services</td>
<td>KPMG LLP</td>
<td></td>
<td><a href="mailto:mjfritz@kpmg.com">mjfritz@kpmg.com</a></td>
</tr>
<tr>
<td>Mark Martin</td>
<td>Principal, Economic &amp; Valuation Services</td>
<td>KPMG LLP</td>
<td></td>
<td><a href="mailto:mrmartin@kpmg.com">mrmartin@kpmg.com</a></td>
</tr>
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Uncertainty churns …

- How will tax authorities interpret BEPS guidance? How will they use Action 13 information to audit?
  - Will stated plans for increased enforcement materialize?
  - What will JITSIC do?
  - What impact will MLIs and EU anti-avoidance directives have?
- How should BEPS technical guidance impact your transfer pricing policies? Consider Actions 4, 8-10, 13, etc.
- What risks will Action 13 disclosures create?

- What tax reform guidance will come and when?
- Will FS industry concerns be appropriately addressed?
- How will non-US tax authorities view changes as a result of US tax reform?
- How might any changes made for tax purposes impact regulators?
Where can taxpayers turn to find certainty (or at least reduce uncertainty)?

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