# Joint International Tax Conference

Briefings

24 October 2022

Ana Cecilia Rojí Gómez and María Alejandra Frías Arce bring you a round up of the annual Joint International Tax Conference.

This annual International Tax Conference presented by King's College London, the Chartered Institute of Taxation, ADIT and the International Fiscal Association took place online on 14 and 15 July. Professor Jonathan Schwarz, Barrister at Temple Tax Chambers and Director of the International Tax Law LLM at King's, and Clive Gawthorpe, Chair of the CIOT European Branch, welcomed attendees from many countries.

## Opening keynote speech

Manuel de los Santos, Head of the OECD Transfer Pricing Unit, gave the opening keynote speech. He noted that the arm's length principle and Pillar 1 will co-exist for some time.

Manuel discussed the three main elements that differentiate the recently published 2022 Transfer Pricing Guidelines from previous editions: when and how the transaction profit split method should be used instead of other methods; the new chapter 10 on financial transactions; and hard-to-value intangibles. He also announced that the OECD would soon undertake a study of taxation and global mobility as one of the key emerging issues.

## Technical sessions

The conference featured a series of panel sessions:

- Current issues in transfer pricing: led by Renata Ardous, Head of Global Transfer Pricing at Chanel;
- Recent international tax cases: led by Jonathan Schwarz;

- Pillar I and II: what about the rest of us?: led by Chair Jennie Rimmer, Group Head of Tax at Canopius; and
- Taxation and digital nomads, post-pandemic: led by Jennifer Bravin, Head of Employment Taxes at BT plc.

Each of the panel sessions featured contributions from business and academic thought leaders from firms and countries around the world, offering a range of different perspectives and insights.

You can find a detailed round-up of the panel sessions in the full article, available on our website at www.tax.org.uk/adit/blog.

## Closing keynote speech

Liselott Kana, Co-Chair of the UN Tax Committee, gave the concluding keynote speech, with highlights of the UN's work on the new UN Model with additions to the Commentary, especially where it diverged from the OECD Model.

Liselotte explained that the new article 12B was designed to address the concerns of developing countries relating to the digital economy. The UN Tax Committee was looking at a multilateral instrument to give rapid effect to the new article 12B. Pillar 1 would not bring benefits to some developing countries that saw digital services taxes as their solution. It was important to have treaties that reflected their concerns to avoid a growth in treaty overrides, as part of maintaining the international rules-based order.

*Ana Cecilia Rojí Gómez is a tax lawyer who has international tax experience via her three years working for a top Mexican law firm. She is currently undertaking the LLM in International Tax Law at King´s College London. Ana also has renewable energy credentials, having established her own start-up in this area which she ran between 2017 and 2019, having met her co-founders in Silicon Valley while on a US State Department scholarship.*

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**Find out more about the events for this year's Joint International Tax Conference at: [www.tax.org.uk/adit/blog](www.tax.org.uk/adit/blog)**

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Ana Cecilia Rojí Gómez

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María Alejandra Frías Arce