



6TH ANNUAL AFRICA

TRANSFER PRICING SUMMIT

15 - 17 NOVEMBER 2017
African Pride 15 on Orange Hotel, Cape Town

PROGRAMME

Book your ticket now at www.thesait.org.za



DAY ONE

WEDNESDAY, 15 NOVEMBER 2017

08:30 – 09:15	Economic State of Africa Investment within Africa has recently become more challenging due to various global and local challenges. This session explores the expected trends for 2018 and 2019 from a commodity and non-commodity perspective, taking into account the impact of local political forces.	SPEAKERS: <i>Keith Engel (SAIT)</i> <i>George Rautenbach (African Business Experts)</i> <i>Christie Viljoen (KPMG)</i> <i>Francois Conradie (NKC African Economics)</i>
09:15 – 09:45	Regional Tax Climate – Tough Going! As the African investment climate becomes more challenging, so too has the tax environment. This session will explore the regional tax environment, taking into account the growing tax risks for companies caused by rising Government revenue targets and the ongoing BEPS narrative.	SPEAKERS: <i>Thabo Legwaila (Citibank)</i>
09:45 – 10:30	Essence of Global Supply Chains Understanding the globalisation of economies is an essential feature of modern economies. This globalisation has led the disbursement of supply chains and logistics which serves an essential back-drop for analysing transfer pricing and other international considerations.	SPEAKERS: <i>Michael Hewson (Graphene Economics)</i> <i>Craig Mitchell (EY)</i>
10:30 – 11:00	Tea Break	
11:00 – 11:45	Transfer Pricing and OECD Reporting: Regional Adopters This session will cover regional trends in terms of transfer pricing documentation and country-by-country reporting as evidenced in various legislative, regulatory and administrative announcements.	SPEAKERS: <i>David Lerner (PwC)</i> <i>Tebogo Mathosa (SARS)</i> <i>Valdis Leikus (Graphene Economics)</i>
11:45 – 12:30	The Multilateral Instrument and Other Emerging Hindrances in Terms of the Tax Treaty Network This session will cover the latest regional signatures in terms of the multilateral instrument and other local country efforts to limit the application of treaties. Ultimately at issue is Government's concern about treaty shopping versus the need for multinationals to have a viable treaty network.	SPEAKERS: <i>Deborah Tickle (KPMG)</i> <i>Wally Horak (Bowmans)</i> <i>Le Roux Roelofse (Deloitte)</i>
12:30 – 13:30	Lunch	
13:30 – 14:15	Global Supply Chain Case Studies: Mineral Extraction and Distribution A multidisciplinary panel will discuss the business rational and tax risks associated with the supply chain of two different mineral exports.	SPEAKERS: <i>Nishana Gosai (Baker McKenzie)</i> <i>Billy Joubert (Deloitte)</i> <i>Owen Murphy (BDO)</i>
14:15 – 15:00	Regional Customs Trends: Trade Barriers and the Emerging Customs Misinvoicing Narrative Trade barriers continue to be an impediment on the continent in practical and monetary terms despite the many regional trade conferences designed to ease cross-border business activity. The purpose of this session is to discuss current regional progress to date and whether Africa is indeed going backward despite governmental rhetoric to the contrary. This session will also cover growing commentary on customs invoicing and the impact this dialogue has in terms of the transfer pricing analysis.	SPEAKERS: <i>Wilimien Viljoen (Tralac)</i> <i>Dermott Gaffney (KPMG)</i> <i>Andre Erasmus (ENSAfrica)</i>
15:00 – 15:30	Tea Break	
15:30 – 16:15	Global Supply Chain: Consumer Goods Production and Sale A multidisciplinary panel will discuss the business rational and tax risks associated with the supply chain of two different sets of consumer goods.	SPEAKERS: <i>Christian Wiesener (KPMG)</i> <i>Andreas Muntingh (Shoprite)</i> <i>Craig Mitchell (EY)</i>
16:15 – 17:00	Profit Withdrawals In Africa, making profits is one thing – withdrawing those profits is another. This session explores the various exchange control, currency and withholding tax challenges associated with these regional withdrawals.	SPEAKERS: <i>Celia Becker (ENSAfrica)</i> <i>Le Roux Roelofse (Deloitte)</i> <i>Victor Adegite (KPMG Nigeria)</i> <i>Tayo Ogungbenro (KPMG Nigeria)</i> <i>Anne Bennett (Webber Wentzel)</i>

Book your ticket now at www.thesait.org.za



DAY TWO

THURSDAY, 16 NOVEMBER 2017

08:30 – 09:00	African Investment Incentives: Benefits and Limitations Many African countries continue to offer tax incentives in order to attract investment in the form of exemptions and enhanced / accelerated deductions. This session covers the more notable incentives, their impact on investment decision-making and the audit risks associated with ensuring that these incentives deliver as expected.	SPEAKERS: <i>Duane Newman</i> (Cova Advisory) <i>Victor Adegite</i> (KPMG Nigeria) <i>Keith Engel</i> (SAIT)
09:00 – 09:45	Global Supply Chain: Manufacture and Distribution A multidisciplinary panel will discuss the business rational and tax risks associated with the automotive supply chain.	SPEAKERS: <i>Duane Newman</i> (Cova Advisory) <i>Jens Brodbeck</i> (ENSAfrica) <i>Sebueng Mthembu</i> (PPC Cement)
09:45 – 10:30	Data Analytics The need for data analytics has mushroomed exponentially over the last 20 years with financial systems struggling to keep pace and with transfer pricing highlighting this need to ever increasing levels. This session covers the latest developments in transactional data analytics as well as business intelligence.	SPEAKERS: <i>Mariette Cruywagen-Louw</i> (Infinite Tax) <i>JP Borman</i> (PwC) <i>Simon Pilbeam</i> (Pilbeam UK and South Africa) <i>Christiana Neal</i> (Boland College)
10:30 – 11:00	Tea Break	
11:00 – 11:45	Thin Capitalisation and an Analysis of Debt Funding This session explores the various tax restrictions in respect of debt payment in terms of thin-capitalisation and transfer pricing analysis imposed by various African countries. This session will also include a commercial pricing analysis of debt funding and the risks associated with circular financing (e.g., the Australian Chevron case).	SPEAKERS: <i>Karen Miller</i> (Webber Wentzel) <i>Eloneor Ekweze</i> (Deloitte) <i>Corneli Espost</i> (PwC)
11:45 – 12:30	Global Supply Chain: Payment Systems and Investment Flows A multidisciplinary panel will discuss the unique challenges of payment systems within Africa as well as issues relating to funding limitations. These issues will touch upon tax, regulatory and other restrictions.	SPEAKERS: <i>Jeanne Havinga</i> (Standard Bank) <i>Karen Miller</i> (Webber Wentzel)
12:30 – 13:30	Lunch	
13:30 – 14:15	Pricing Intra-Group Know-How Multinationals often provide various forms of know-how to their local subsidiaries. This session covers the various forms of know-how provided within the region and the viable pricing methods associated with these forms of know-how.	SPEAKERS: <i>Christian Wiesener</i> (KPMG) <i>Billy Joubert</i> (Deloitte) <i>JP Borman</i> (PwC)
14:15 – 15:00	Handling Transfer Pricing Without Regional Comparables One recurring issue in African transfer pricing is the lack of regional comparables. This session explores the various reliable alternatives and official pronouncements addressing this gap.	SPEAKERS: <i>Michael Hewson</i> (Graphene Economics) <i>Anton Luckoff</i> (Bureau Van Dyk) <i>Marcus Stelloh</i> (Grant Thornton)
15:00 – 15:30	Tea Break	
15:30 – 16:15	Technical Skill Expatriates Multinationals frequently send their skilled employees on short-term and long-term trips to various local African countries. This session explores the various transfer pricing, permanent establishment and other double tax challenges associated with these trips as well as visa / labour employment challenges.	SPEAKERS: <i>Nikki Oberholzer</i> (Vodacom) <i>Arnaaz Camay</i> (Baker McKenzie) <i>Celia Becker</i> (ENSAfrica) <i>Caoilfhionn van der Walt</i> (Regan van Rooy)
16:15 – 17:00	Pricing Cross-Border Management Services One of the biggest recurring challenges for multinationals involves the payment for intra-group services provided by the head office and regional shared service centres. This session explores the transfer pricing and other tax challenges as well as exchange control restrictions for payments.	SPEAKERS: <i>Nikki Oberholzer</i> (Vodacom) <i>Marius Leivestad</i> (EY) <i>Craig Bain</i> (Grant Thornton) <i>Charles de Wet</i> (PwC) <i>Marieta Putter</i> (Standard Bank)

Book your ticket now at www.thesait.org.za



DAY THREE

FRIDAY, 17 NOVEMBER 2017

08:30 – 09:30	Transfer Pricing Documentation – Practical Challenges Cross-border documentation has become an increasing challenge in a post-BEPS environment. This session explores the practical challenges associated with obtaining this information and the various interpretative issues associated with the OECD and local regulatory requirements.	SPEAKERS: <i>Amit Chadha</i> (KPMG) <i>Michiel Els</i> (EY) <i>Marius Leivestad</i> (EY) <i>Marcus Stelloh</i> (Grant Thornton) <i>Phindile Mkhize</i> (SARS)
09:30 – 10:30	Managing Transfer Pricing Disputes – Lessons Learned This session focuses on the dispute process associated with transfer pricing starting from revenue authority documentation requests. Posturing cases for administrative and litigation will be considered as well as common pitfalls.	SPEAKERS: <i>Jens Brodbeck</i> (ENSafrica) <i>Mmangaliso Nzimande</i> (EY) <i>Nina Keyser</i> (Webber Wentzel) <i>Corneli Espost</i> (PwC)
10:30 – 11:00	Tea Break	
11:00 – 11:45	Pay-Now-Argue Later: Current Trends The pay-now-argue-later principle has become one of the biggest risks for multinationals in the region. This session covers legitimate uses of the principle and how companies can avoid unreasonable assertions so as to protect core cash flow.	SPEAKERS: <i>Michiel Els</i> (EY) <i>Mmangaliso Nzimande</i> (EY) <i>Nina Keyser</i> (Webber Wentzel) <i>Tayo Ogungbenro</i> (KPMG Nigeria)
11:45 – 12:30	Reflecting on the UN Transfer Pricing Manual There has been an increasing effort on tailoring transfer pricing to suit developing country concerns. This session focuses on the UN manual and the key advice given that impacts regional business activities.	SPEAKERS: <i>Nishana Gosai</i> (Baker McKenzie) <i>Craig Bain</i> (Grant Thornton) <i>Valdis Leikus</i> (Graphene Economics)
12:30 – 13:30	Lunch	