

Taxing Innovation and Transfer Pricing for the Corporate Sector

Programme

Time	Topic	Speakers
09.15 – 09.30	Registration	
09.30 – 11.00	R&D <ul style="list-style-type: none"> • R&D tax credit • Specified Intangible Asset Relief • Allowance for scientific research • Corporation tax compliance - what disclosures are required? • International comparisons 	Ian Collins, EY
11.00 – 11.15	Tea/Coffee Break	
11.15 – 12.30	Knowledge Development Box (KDB) <ul style="list-style-type: none"> • KDB refresher • Update on Revenue guidelines • Corporation tax compliance - what disclosures are required? • International comparisons How Revenue audit innovation <ul style="list-style-type: none"> • R&D tax credit/KDB interventions and audits • How to prepare for an audit 	Terri Treacy, KPMG
12.30 – 12.45	Panel Discussion and Q&A session	
12.45 – 13.30	Lunch	
13.30 – 14.15	Transfer Pricing and Global tax changes <ul style="list-style-type: none"> • Upcoming international tax changes • US Tax Reform – TP Considerations 	Warren Novis, Aptiv plc
14.15 – 14.30	Q&A session	
14.30 – 15:00	Transfer Pricing – the mechanics <ul style="list-style-type: none"> • Transfer pricing methodologies for common business arrangements • Compliance obligations • Tax authority audits and disputes 	Gavan Ryle & Cillian Lee, PwC
15:00 – 15:15	Tea/Coffee Break	
15:15 – 16:15	Transfer Pricing – the mechanics – cont'd <ul style="list-style-type: none"> • Transfer pricing methodologies for common business arrangements • Compliance obligations • Tax authority audits and disputes 	Gavan Ryle & Cillian Lee, PwC
16.15 – 16.30	Q&A session	

Speaker Bios

Ian Collins is Head of the National R&D tax practice at EY in Ireland with responsibility for overall management and quality assurance of Irish R&D claims. He is a Chartered Tax Adviser (CTA) and council member of the Irish Tax Institute and a member of Chartered Accountants Ireland. Ian has been making R&D tax claims for clients in various industry sectors since the introduction of the Irish

regime in 2004. He secured the first Irish Revenue pre-approval for a client in the software sector, encompassing a technical review by an industry expert engaged by Irish Revenue. He also conducts training seminars and workshops on R&D eligibility and claim process.

Cillian Lee is a manager in the Tax & Legal Services practice of PwC and specialises in Transfer Pricing. Cillian has worked with a wide range of multinationals across a number of industries to assist these companies to set, document and defend transfer pricing policies for the transactions involving their Irish and overseas operations. Cillian is a Chartered Tax Adviser (CTA).

Warren Novis is Global Transfer Pricing Director for Aptiv plc (formerly part of General Motors) – a recently re-headquartered Irish plc with operations in more than 40 countries and over 100,000 employees. In his current role, Warren is in charge of the company's effective management of transfer pricing policies, compliance and audit defence matters together with wider corporate tax responsibilities. Previously a Director with KPMG, Warren assisted companies find practical solutions to common issues in planning, controversy, operations and tax accounting matters.

Gavan Ryle is a Partner in the Tax & Legal Services practice of PwC and specialises in Transfer Pricing. He leads a team of 35 who advise multinational companies on Transfer Pricing planning and focuses on structuring their international related party transactions efficiently. Gavan works with a wide range of Irish headquartered multinationals across a number of industries to assess and implement intercompany business models. He also assists foreign multinationals to set, document and defend transfer pricing policies for the transactions involving their Irish operations, with a particular focus in recent times on intellectual property, substance and control of business risks. Gavan is a Fellow of Chartered Accountants Ireland and a member of the Irish Tax Institute.

Terri Treacy is a director with KPMG. She has worked with KPMG for over 10 years advising a range of multinational and indigenous corporate clients across a variety of sectors including in particular the Medtech, Pharma and ICT sectors. Terri has extensive experience in preparing and supporting under audit R&D tax credit claims. Terri has lectured for many years on behalf of the Irish Tax Institute and also at NUI Galway. Terri is a Chartered Tax adviser (CTA) and an Associate Member of Chartered Accountants Ireland.