



International Tax Conference 2026 - Dubai

Achieving International Corporate Tax Certainty in an Uncertain Tax Environment

5 February 2026

Venue: Mohammed Bin Rashid Library, Dubai

Organized by

The International Tax Law Research and Policy Network

Co-Organized by

Government of Dubai's Department of Finance

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Tax Awareness

Overview

International corporate tax controversies are on the rise, in particular, **in the areas of Transfer Pricing and Tax Treaty Interpretation.** Controversy is expected to further increase for MNEs because of the complexity as well as the ongoing developments associated with the **Pillar II Global Minimum Tax project, in particular, the recently released Side by Side Agreement.**

Against this background, the International Tax Law and Policy Research Network (ITLRN) will host its fifth international tax event in Dubai (UAE) **to discuss the sources of tax uncertainty and the mechanisms available to countries to grant tax certainty in order to retain / promote foreign investment into their territories.**

This event follows the successful completion of our research networks past four events which were held in **Belgrade (2022 with 150 participants), Milan (2023 with 200 participants), Vaduz (2024 with 220 participants) and London (2025 with 300 participants) respectively.**



Following the success of its event in London which was hosted by Kings College (in June 2025), ITLRN will host on **February 5th, 2026**, its event series focused on Global Tax Certainty in Dubai, UAE. We are grateful to the Department of Finance (Dubai) who has agreed to kindly collaborate with ITLRN and support this event.

The purpose of this event is to explore the current sources of **international corporate tax uncertainty, the current and future trends** in managing international corporate tax uncertainty at a global and regional level as well as to deliberate on practical experiences when the various cross border dispute prevention and resolution tools are invoked to settle / resolve disputes.

The event is also timely as UAE has recently released its guidance **on Mutual Agreement Procedures (MAPs) and Advance Pricing Arrangements (APAs).**

The speakers in this event include renowned experts with different backgrounds coming from academia (prominent tax law professors who regularly act as experts in policy matters or complex cases), tax administration/competent authorities, policy making organisations, members of private practice (international corporate tax and transfer pricing partners) and tax directors from different MNEs.

Achieving International Corporate Tax Certainty in an Uncertain Tax Environment

5 February 2026: Mohammed Bin Rashid Library - Auditorium

PROGRAM

8.00 – 8.30 Registration and welcome coffee

8.30 – 8.50 Welcome remarks

- Main event host: Abdulaziz Mohammed Al Mulla, Commissioner for Tax Affairs, Dubai Finance, Government of Dubai
- ITLRN Representative: Prof. Dr. Vikram Chand, University of Lausanne, Switzerland (Conference Chair)
- Main event partners: Alex Law, Partner, Deloitte UAE and James Anderson, Partner, Skadden, UK

Part 1 : UAE and Global developments

8.50 – 9.00 Key note Speech

- Sara Al Habshi, Chief Executive Officer of Tax Compliance Sector, Federal Tax Authority, UAE

9.00 – 9.45 Panel Discussion with

- Shabana Begum, Executive Director - Tax Policy Sector at the UAE Ministry of Finance
- Ridha Hamzaoui, Tax Policy Senior Expert, Federal Tax Authority, UAE
- Prof. Dr. Vikram Chand, University of Lausanne, Switzerland
- Juliana Candido Campos, Senior Tax Studies and Reports Expert, Dubai Finance, UAE

9.45 – 9.55 Setting the scene

- Prof. Dr. Svetislav Kostic, University of Belgrade, Serbia

9.55 – 10.55 Panel 1: Transfer Pricing related Tax Audit and Dispute trends

Moderator: Dr. Stefano Simontacchi, Partner, BonelliErede, Italy and Marco Adda, Partner, BonelliErede, Italy

- Manuel De Los Santos Poveda, Head of Transfer Pricing Unit, OECD
- Daniel Prates, Competent Authority Leader, Brazil
- Nauryzbek Abduokhapov, Senior expert at Transfer Pricing division of Specialised department of the State Revenue Committee of Republic of Kazakhstan
- Fachrizal Septian, APA/MAP Competent Authority Delegate and Negotiator, Indonesia
- Siegert Slagman, Global Tax Vice-President, Japan Tobacco International, Switzerland

Panel Coordinator: Karen Hernandez Leon, Deloitte

10.55 – 11.10 Coffee break

11.10 – 12.10 Panel 2: Tax Treaty related Tax Audit and Dispute trends

Moderators: Mukesh Butani, BMR Legal, India

- Carlos Protto, Director of International Tax Relations, Ministry of Economy, Argentina
- Pitambar Das, Joint Secretary and Director, Tax Policy, Income Tax Department, Government of India, India
- Amir Zainuddin Bin Abdul Hamid, Director, MAP Division, Department of International Taxation, Inland Revenue Board of Malaysia
- Robbie Bañaga, Chief, International Tax Affairs Division, Bureau of Internal Revenue, Philippines
- Julian Valverde, Group Head of Tax, Sidara, UAE

Panel Coordinator: Karen Hernandez Leon, Deloitte

12:10 – 13.10 Panel 3: QDMTTs and Tax Incentives in light of the SBS package and potential dispute areas

Moderator: Jan Van Abbe Roderick, Partner, Deloitte UAE

- Melanie Dewi Astuti, Senior International Tax Analyst, Fiscal Policy Agency Ministry of Finance, Indonesia (and lead for Pillar II implementation)
- Intouch Piyanawin, Legal Officer at the Revenue Department, Thailand (and lead for Pillar II implementation)
- Francesco Bungaro, Pillar 2 Leader, EU Commission
- Javaad Khan, Global Head of Tax, Emirates
- Sebastian Bock, Vice President Finance at the Investment Corporation of Dubai (ICD)

13.10 – 14.00 Lunch

14.00 – 14.15 Update on the OECD Agenda on Tax Certainty

- Dr Achim Pross, Deputy Director, Centre for Tax Policy, OECD

14.15 – 14.55 Panel 4: Policy Makers Perspective : Recent updates on preventing and resolving international tax controversies

Moderator: Joe Duffy, Partner, Matheson, Ireland

- Sriram Govind, Acting Co-Head of Tax Certainty Unit, OECD, France
- Khairilia Basrah Kadir, Competent Authority Delegate and Negotiator, Indonesia
- J. Saravanan, Commissioner of Income Tax (APA), Department of revenue, Ministry of Finance, Government of India

Panel Coordinator: Camille Tirand, UNIL

Part 3 : Preventing and Resolving International Corporate Tax Disputes

14.00 – 14.15 Setting the scene

- Prof. Dr. Paolo Arginelli, Università Cattolica del Sacro Cuore / Partner, Pirola Pennuto Zei, Italy

14:55 – 15.45 Panel 5: Preventing transfer pricing disputes – Practical experience / perspectives on APAs and other tools for Transfer Pricing

Moderator: David Farhat, Partner, Tax, Skadden, USA

- Mekar Satria Utama, Director, Directorate of International Tax, DGT; Indonesia
- Jean Ussel, Competent Authority of Mexico
- Dominic Vines, Team leader of HMRC's Transfer Pricing (Competent Authority) team, United Kingdom
- Avni Dika, Global Head of Transfer Pricing, Syngenta Group, Switzerland

Panel Coordinator: Camille Tirand, UNIL

15.45 – 16.00 Coffee Break

16:00 – 16.50 Panel 6: Resolving transfer pricing disputes – Practical experience / perspectives on MAPs and Arbitration for Transfer Pricing

***Moderators: David Farhat, Partner, Tax, Skadden, USA
and Joan Hortalà, Partner Cuatrecasas, Spain***

- Fachrizal Septian, APA/MAP Competent Authority Delegate and Negotiator, Indonesia
- Jean Ussel, Competent Authority of Mexico
- Dominic Vines, Team leader of HMRC's Transfer Pricing (Competent Authority) team, United Kingdom
- Vineet Rachh, Vice President, Asia Pacific, Middle East and Africa Tax, Procter & Gamble, Singapore
- Sebastiaan De Buck, Global Head of Tax, Unilever, Netherlands

Panel Coordinator: Camille Tirand, UNIL

16:50 – 17.50 Panel 7: Preventing and resolving tax treaty disputes and broader international tax disputes – Practical perspective and future outlook

Moderators: Juliana Candido Campos, Senior Tax Studies and Reports Expert, Dubai Finance and Kinga Romanovska, Independent Expert on International Tax

- Faycal Abdoulaye, Chief of Tax Legislation, Cameroun
- Sarah Belgareh, Head, MAP division, Morocco
- Kashif Jahangiri, Partner and Tax Leader, Deloitte Saudi Arabia

Panel Coordinator: Camille Tirand, UNIL

17.50 – 18.00 Closing remarks

- Prof. Dr. Vikram Chand, University of Lausanne, Switzerland

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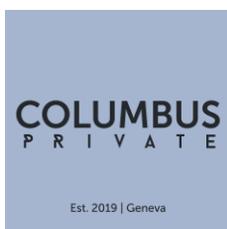
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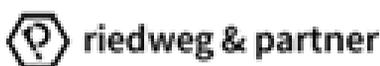
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Registration

Registration for the conference: See conference website
Registrations close on January 31, 2026

Registration fees per person: AED 1000 .— (includes refreshments and lunch)

Sponsorship queries contact: fo@columbusprivate.ch

Media: Media coverage of the event is not permitted unless specifically allowed by DOF Dubai. Prior permission is required

Venue

Mohammed Bin Rashid Library – Auditorium

89 - 90 Al Khail Rd - near Obeid Juma Bin Suloom Shipyard
Al Jadaf - Dubai



How to get there:

By Metro: The Green Line's Creek Metro Station is your closest stop, just a 5–10 minute walk to the library.

By Bus: Route C04 stops at Creek Metro Station, keeping you a short stroll away.

By Taxi: Convenient drop-off and pick-up points are right in front of the library's main entrance

By Taxi: Parking will be available

