



# International Tax Conference 2026 – Dubai

## Achieving International Corporate Tax Certainty in an Uncertain Tax Environment

**5 February 2026**

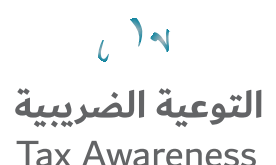
**Venue: Mohammed Bin Rashid Library, Dubai**

*Organized by*

The International Tax Law Research and Policy Network

*Co-Organized by*

Government of Dubai's Department of Finance



# 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 5<sup>th</sup>, 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 – 8.45 Welcome remarks**

- ITLRN Representative: Prof. Dr. Vikram Chand, University of Lausanne, Switzerland / Government Advisor / Independent Expert on International Tax Dispute Management (conference chair)
- Main event host: H.E, Abdulrahman Saleh Al Saleh, Director General, Department of Finance, Dubai
- Main event partners: Alex Law, Partner, Deloitte UAE and James Anderson, Partner, Skadden, UK

### Part 1 : UAE and Global developments

*Session Chair / Moderator : Prof. Dr. Vikram Chand*

**8.45 – 9.00 Key note Speech**

- H.E, Mr. Khalid Ali Al Bustani, Director General Federal Tax Authority, UAE\*

**9.00 – 9.45 Panel Discussion with**

- Abdulaziz Mohammed Al Mulla, Commissioner for Tax Affairs, DoF Dubai
- Shabana Begum, Executive Director - Tax Policy Sector at the UAE Ministry of Finance
- Ridha Hamzaoui, Tax Policy Senior Expert, Federal Tax Authority
- Dr. Achim Pross, Deputy Director, Centre for Tax Policy and Administration, OECD

### 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)

*Panel Coordinator: Karen Hernandez Leon, Deloitte*

## 13.10 – 14.00 Lunch

### Part 3 : Preventing and Resolving International Corporate Tax Disputes

## 14.00 – 14.10 Setting the scene

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

## 14.10 – 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

*Panel Coordinator: Camille Tirand, UNIL*

## 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, Mexican International Transfer Pricing Expert, 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*

- Mekar Satria Utama, Director, Directorate of International Tax, DGT; Indonesia
- Jean Ussel, Mexican International Transfer Pricing Expert, 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, DOF and Kinga Romanovska, Independent Expert on International Tax*

- Faycal Abdoulaye, Chief of Tax Legislation, Cameroun
- Sarah Belgareh, Head, MAP division, Morocco
- Alpha Ngom, Senior International Tax Advisor, Senegal – Chairperson of the Cross Border Taxation Technical Committee, ATAF
- Kashif Jahangiri, Partner and Tax Leader, Deloitte Saudi Arabia

*Panel Coordinator: Camille Tirand, UNIL*

## 17.50 – 18.00 Closing remarks

- Prof. Dr. Vikram Chand

\*Please note that this is an almost finalized agenda. While majority of the speakers have confirmed their participation, the final agenda, depending on the availability of the speakers, could look different. Other speakers could also be added at a later stage.

# Contact

## ITLRN Founders



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## Main event host and Co-organizer



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# This event is supported by the following institutions (with more to join)



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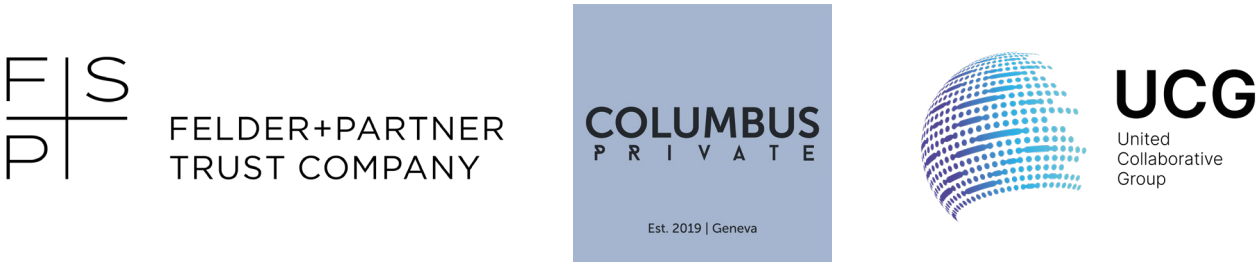
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# Registration

**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](mailto: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

