



7th WBG/IMF

TAXSUNDAY CONFERENCE

PROGRAM & BIOGRAPHIES

**International Tax Avoidance —
What Has BEPS Accomplished for
Developing Countries?**

October 18, 2020
8:30 AM – 10:30 AM EDT

VIRTUAL CONFERENCE



WORLD BANK GROUP

AGENDA

8:30 – 8:40 AM

Welcoming Remarks

Mr. Marcello Estevão, Global Director, Macroeconomics, Trade and Investment Global Practice (MTI GP), World Bank

Mr. Vitor Gaspar, Director of the Fiscal Affairs Department of the International Monetary Fund, IMF

8:40 – 9:10 AM

A conversation on the experience of BEPS in developing countries

This conversation will focus on key questions about developing countries' experiences since the agreement on the Base Erosion and Profit Shifting (BEPS) package in 2015.

Moderator

- Ms. Victoria J. Perry, Deputy Director, Tax Policy, Fiscal Affairs Department, IMF

Speakers

- Mr. Ahmed Kouchouk, Vice Minister of Finance for Fiscal Policies & Institutional Reform, Egypt
- Ms. Marilou Uy, Director of the Intergovernmental Group of Twenty-Four on International Monetary Affairs and Development (G-24)
- Prof. Michael Devereux, Professor of Business Taxation, Said Business School, University of Oxford

9:10 – 9:50 AM

Panel 1: Where are we with BEPS? A stocktake of progress from developing countries' point of view

In this panel session we will explore the present state and the challenges that BEPS poses for developing countries.

Moderator

- Ms. Chiara Bronchi, Practice Manager, Fiscal Policy and Sustainable Growth Unit, MTI GP, World Bank

Panelists

- Mr. Chris Morgan, Head of Global Tax Policy, KPMG
- Ms. Lee A. Sheppard, Contributing Editor, Tax Analysts' Tax Notes Federal
- Mr. Pascal Bizimana Ruganintwali, Commissioner General, Rwanda Revenue Authority, MINECOFIN, Rwanda
- Mr. Rasmi Ranjan Das, Joint Secretary (Foreign Tax & Tax Research)-I, Department of Revenue, Ministry of Finance, India

9:50 – 10:30 AM

Panel 2: Future Directions

This session will discuss what can be learned from the BEPS experience so far for achieving development outcomes through international taxation cooperation.

Moderator

- Ms. Mary Baine, Director of Tax Programs, The African Tax Administration Forum (ATAF)

Panelists

- Mr. Alvin Mosioma, Executive Director, Tax Justice Network-Africa
- Mr. Ben Dickinson, Head of the Global Relations and Development Division, OECD
- Mr. Dang Ngoc Minh, Deputy Director General, General Department of Taxation, Ministry of Finance, Vietnam
- Ms. Marlene Nembhard Parker, Chief Tax Counsel, Legislation, Treaties and International Tax Matters, Tax Administration Jamaica

BIOGRAPHIES



Marcello Estevão

Global Director, Macroeconomics, Trade and Investment
Global Practice (MTI), World Bank Group

Welcoming Remarks

Mr. Marcello de Moura Estevão Filho is the Global Director of the World Bank Group's Macroeconomics, Trade and Investment Global Practice (MTI).

In this position, Mr. Estevão leads a large team of country economists, macroeconomists, and fiscal policy, debt, and macro-modeling experts. He is responsible for overseeing the delivery of the global analytical work on fiscal policy, debt policy, and economics of climate change; for coordinating the strategic direction of MTI and implementing it; for helping to shape and oversee MTI's country/regional programs; and for mobilizing staff to work more effectively across Equitable Growth, Finance and Institutions (EFI) and other Global Practices.

Before joining the Bank, Mr. Estevão was Deputy Minister for International Affairs at the Ministry of Finance in Brazil until end-December 2018 and served as Brazil's G20 Deputy. He also served as the Chairman of the Board of Directors of the New Development Bank (Shanghai) and member of FUNCEF's Board of Directors. Prior to this position, he worked at Tudor Investment Corporation as the chief-economist for North America and Oceania, at the International Monetary Fund (IMF) as mission chief to Peru, Nicaragua and Barbados; and deputy chief of the Regional Studies Division, the North American Division, and the Latin-Caribbean Division, after working on several European countries and the Euro Area, and at the Research and Statistics Division of the Federal Reserve Board in Washington, DC, as a researcher and member of the Green Book forecast team.

Mr. Estevão is Brazilian, holds a PhD in Economics from MIT, Cambridge, MA, and has published extensively in refereed journals, books, policy reports, and the print media.



Vítor Gaspar

Director, Fiscal Affairs Department, IMF

Welcoming Remarks

Mr. Vítor Gaspar has been the Director of the Fiscal Affairs Department of the International Monetary Fund since 2014.

Mr. Gaspar was the Minister of State and Finance of Portugal from 2011-13. He has held various positions in European and Portuguese institutions, including head of BEPA at the European Commission, director general of research at the European Central Bank, director of Economic Studies and Statistics at the Central Bank of Portugal, and Director of Economic Studies at the Portuguese Ministry of Finance.



Victoria J. Perry

Deputy Director, Fiscal Affairs Department, IMF

Moderator: Conversation on BEPS

Ms. Victoria Perry is a Deputy Director in the Fiscal Affairs Department of the International Monetary Fund, specializing in taxation.

Since joining the IMF in 1993, she has provided technical assistance in tax policy and revenue administration to more than 50 countries on all continents. She served for 7 years as Division Chief for Revenue Administration in FAD, and for 8 years as Division Chief for Tax Policy. She is a coauthor of the book *The Modern VAT*, published by the IMF in 2001.

Prior to joining the IMF, Ms. Perry was the Deputy Director of the Harvard University International Tax Program, before which she practiced tax law with the Boston law firm of Hale and Dorr (now WilmerHale).

She is currently vice president of the International Institute of Public Finance, and is a past President of the National Tax Association, a past president of the American Tax Policy Institute, and past Chair of the Value Added Tax Committee of the American Bar Association Section of Taxation.

She received her J.D. from the Harvard Law School, and her B.A. from Yale University.



Ahmed Kouchouk

Vice Minister of Finance for Fiscal Policies & Institutional Reform

Panelist: Conversation on BEPS

Mr. Ahmed Kouchouk was appointed as the Vice Minister of Finance for Fiscal Policies & Institutional reform in March 2016. Since then he has been playing a leading role in designing and implementing Egypt's macroeconomic policies and reforms, especially fiscal and debt policies. Mr. Kouchouk served as the leading negotiator and focal point on behalf of the Government of Egypt with the IMF.

Mr. Kouchouk in his capacity, supervises and oversees the work of various policy related units and departments at the Ministry of Finance including Macro Fiscal Unit, Debt Management unit, Public Private Partnership unit, Transparency and Citizen Engagement unit, Public Financial Management unit, and Institutional reform unit.

Mr. Kouchouk leads and supervises several work streams at the Ministry of Finance including engagement with International institutions, rating agencies, Investment Banks and portfolio investors. He also supervises and manage the process of setting and updating the Macro Fiscal Framework including setting fiscal & debt targets over the medium-term, preparing the annual budget, monitoring budget implementation, managing fiscal risks, and overseeing debt strategy and related policies. Mr. Kouchouk serves as Egypt representative at the AIIB. In addition, he is the Ministry of Finance nominated focal coordinator with monetary authorities. He served as a Board Member at the Central Bank of Egypt from April 2016 to June 2018. He also leads Egypt's inter-ministerial task force managing annual economic dialogue with the EU.

Mr. Kouchouk is currently a board member at the Arab African Investment Bank, Egypt National Academy for Training, and Egypt Air Holding Company. Mr. Kouchouk is a professional economist and policy advisor with more than 18 years of applied experience. He worked as a senior economist for the World Bank from June 2013 to March 2016. He worked as an Economic Advisor to the Minister of Finance and Director of the Macro Fiscal Unit from 2012-2013 and served as the Executive manager of the Macro Fiscal Policy Unit at the Ministry of Finance from 2007-2008 and 2010-2012. He also worked for Egypt Ministries of External Trade and Economy.

Mr. Kouchouk earned his master's degree in public policy from Harvard Kennedy School of Government in 2010 and earned a master's degree in economics from York University in the United Kingdom in 2002. He has a B.S, in Economics in 1999 from the American University in Cairo. Mr. Kouchouk is married to Amal El-Sayed (Banker and executive coach). They have two kids Salma (13 years) and Omar (11 years).



Marilou Uy

Director of the G-24

Panelist: Conversation on BEPS

Ms. Marilou Uy is Director of the Intergovernmental Group of Twenty-Four on International Monetary Affairs and Development (G-24).

Prior to that, she was the Senior Adviser to the Managing Director at the World Bank. While at the World Bank, she also served as Sector Director for the Africa Financial and Private Sector Development Department from 2007 to 2011 and Director of the Financial Sector Operations and Policy Department in the Financial Sector Vice-Presidency as well as Chair of the Financial Sector Board from 2002 to 2007. Since joining the World Bank in 1985 as part of the Young Professionals Program, she has worked on financial sector and private sector development in Latin America, Middle East, South Asia, and Africa, and globally.

She was also part of the Development Economics Group's research team that prepared "The East Asian Miracle" in 1991, in which she focused on financial sector issues, together with Joseph Stiglitz. Ms. Uy pursued her graduate studies in economics and finance at the University of California, Los Angeles.



Michael Devereux

Professor of Business Taxation, Saïd Business School,
University of Oxford

Panelist: Conversation on BEPS

Mr. Michael Devereux is Director of the Oxford University Centre for Business Taxation, Professor of Business Taxation, Saïd Business School, University of Oxford and Professorial Fellow at Oriel College, Oxford.

He was is Honorary President of the International Institute of Public Finance between and Honorary Fellow of the Chartered Institute of Taxation. He has served as Research Director of the European Tax Policy Forum since 2004.

He was a member of the European Commission High Level Expert Group on Taxation of the Digital Economy in 2014, the UK Government-Business Forum on Tax and Competitiveness and a Special Adviser to the Economic Affairs Committee of the House of Lords in 2013.



Chiara Bronchi

Practice Manager, Fiscal Policy and Sustainable Growth Unit, MTI, World Bank Group

Moderator: Where are we with BEPS?

Ms. Chiara Bronchi is the Practice Manager for the Fiscal Policy and Sustainable Growth Unit in the Macroeconomics, Trade and Investment Global Practice (MTI). She leads a group of macro-fiscal economists and tax experts who work on all ranges of fiscal policy as well as the macroeconomics of climate change, with an emphasis on fiscal policies for climate actions.

Ms. Bronchi has over 25 years of experience in managing multi-stakeholders and multi-disciplinary programs gained in various international organizations namely the ADB, IMF, OECD, UN. She started her professional career as Economic Adviser with the UK government, she joined the OECD in 1998 as Young Professional, then the IMF in 2003 to pursue her career as an Economist. She served at the Head of the Fiscal Affairs Office of Kosovo, under the UN Protectorate before joining the World Bank in 2008 where she led operations as well as analytical work.

Recently she spent two-year on external assignment as the Chief Thematic Officer of the ADB, where she provided vision and goals for the ADB thematic cluster and the ADB Strategy 2030.

Ms. Bronchi holds a PhD from Bologna University and a MSc in Economics from University College of London.



Chris Morgan

Head of Global Tax Policy, KPMG

Panelist: Where are we with BEPS?

Mr. Chris Morgan has been Head of the Global Tax Policy since September 2016.

Mr. Morgan was qualified as a solicitor in 1991 (but longer practicing as a solicitor). Mr. Morgan's background is in international tax where he has nearly 30 years of experience advising a wide range of clients on cross-border investment & structuring, repatriation, supply chain planning, intellectual property management and mergers.

Chris has been involved in setting up a number of KPMG's service areas. In 1998-9 he managed the set-up of KLegal as KPMG's sister law firm which later became independent due to SEC restrictions. In 2000 he set up KPMG Intellectual Property Services (KIPs) – a multi-disciplinary offering dealing with all aspects of IP management. In 2003 he set up KPMG's EU Tax Group.

While leading the EU Tax Group Mr. Morgan has taken cases to the UK tribunals and courts and the Court of Justice of the European Union. He also oversaw litigation in many EU countries, in particular for pension funds and investment funds based in Europe and the US.

Mr. Morgan became Head of Tax Policy for KPMG UK in 2011. In this role he was a regular commentator in the press, as well as on radio and TV, led discussions on various representations with HMRC/HMT. In 2014 Chris spearheaded KPMG UK's Responsible Tax for the Common Good initiative.

In September 2016 he took on the role of Head of Global Tax Policy. As part of this role he runs the Global Responsible Tax Programme (see www.responsibletax.kpmg.com) which brings all stakeholders into a constructive debate about how to make tax systems work for all. The project has actively included input from organisations such as the OECD, IMF, World Bank and UN as well as from a wide range of Civil Society organisations. Mr. Morgan is currently leading a series of roundtables on tax policy responses to the COVID-19 situation.

Mr. Morgan is a member of the UN Sub-committee on Environmental Taxes.



Lee A. Sheppard

Contributing Editor, Tax Analysts' Tax Notes
Federal

Panelist: Where are we with BEPS?

Ms. Lee Sheppard is a contributing editor of *Tax Notes*, a Washington-based weekly tax journal.

Ms. Sheppard is one of the most widely read and respected tax commentators in the world. She has been a mainstay of Tax Analysts' publications for 30 years. She was recently named one of the Global Tax 50 most influential players in international taxation by *International Tax Review*. She was written up in *The New York Times* for her unique contribution to tax reporting.

Ms. Sheppard specializes in financial issues and taxation of multinational corporations. She is known for her commentary on the international consensus, treaty issues, transfer pricing, and European tax developments. She writes about cutting-edge financial issues such as derivatives, hybrid securities and hedge fund questions. She also writes about banking and securities law issues.

Ms. Sheppard is well known for her trenchant and truthful observations. She is fond of spiking her articles with humor and social commentary. She frequently comments on fashion and soccer. She also writes a blog for *Forbes*. She is a member of the Economic Club of New York.

She is frequently asked to speak on tax subjects. She has appeared on television shows such as *60 Minutes* and *Frontline*. She has been featured in the documentaries *We're Not Broke* (Onshore Productions), *An Inconvenient Tax* (Life Is My Movie) and *American Made Movie* (Life Is My Movie).

Ms. Sheppard is trained as a lawyer, having attended Northwestern University and Northwestern University School of Law. She joined Tax Analysts in 1983 after a brief stint in practice. Tax Analysts, the publisher of *Tax Notes* and related publications, is a nonprofit publisher that provides the latest and most in-depth tax information worldwide. www.taxanalysts.com.



Pascal Bizimana Ruganintwali

Commissioner General, Rwanda Revenue Authority, MINECOFIN, Rwanda

Panelist: Where are we with BEPS?

Mr. Pascal BIZIMANA RUGANINTWALI is the Commissioner General for Rwanda Revenue Authority since 18th October, 2018. He served RRA as the Deputy Commissioner General and Commissioner for Corporate services from March 2014 to 18th October 2018 when he was appointed as the Commissioner General.

Prior joining RRA, Mr. Ruganintwali served in different positions in various public institutions as follows:

- Permanent Secretary and Deputy Attorney General in the Ministry of Justice from May 2011 to March 2014,
- Treasury Counsel and Legal Adviser of the Ministry of Finance and Economic Planning of Rwanda from June 2006 to May 2011,
- Deputy Executive Secretary of the National Electoral Commission (Rwanda) in charge of Legal Affairs from August 2000 to June 2006.
- Acting Head of division of Human right in the ministry of justice from January 2000 to August 2000,
- Internship at the Law Firm Me NDAHIRO Faroh and Me Ntwali Francois from March 1998 to December 1999

Educational qualification.

Mr. Ruganintwali holds LLB and LLM (Business law) from the University of Rwanda and a diploma in legal practice. He is the state attorney of RRA. He holds DES in Administration of Elections from Panthéon-Assas University Paris II

Membership of national institutions and Corporations held.

He is a member of the Rwanda Bar Association. Outside his job to serve as GoR official, He had been board member of the cement processing Industry (CIMERWA LTD) representing Government interests. He has acted as Chairperson of the National Independent Review Panel on Public Procurement, Gasabo District Commission in charge of abandoned properties and the Ad hoc Committee in Charge of Legal Framework on Capital Market in Rwanda.



Rasmi Ranjan Das

Joint Secretary (Foreign Tax & Tax Research)-I, Department of Revenue, Ministry of Finance, India

Panelist: Where are we with BEPS?

Mr. Rasmi Ranjan Das is the joint Secretary (Foreign Tax & Tax Research)-I, Department of Revenue, Ministry of Finance, Government of India.

Mr. Das has around 28 years of experience as Member of Indian Revenue Service (IRS) in policy making and implementing Direct Tax Laws in India. Since 2018, Mr. Das is Indian Delegate to Inclusive Framework (IF) - a group of more than 135 countries monitoring BEPS- and Member of its Steering Group-, which is involved in building a consensus-based solution to address direct tax challenges posed by digitalization of the economy. Also, Mr. Das is Indian delegate since 2016 to OECD's Task Force on Digital Economy (TFDE) and member of TFDE bureau.

Mr. Das is part of the Competent Authority of India for North America and Europe responsible for Tax Treaty Negotiation, finalization of Bilateral APA and MAP resolution and Exchange of Information with countries of these regions. Also, he is part of the team that formulates rules, circulars and clarifications relating to International Taxation and Transfer Pricing in India-

From 2016 until February 2019, Mr. Das was part of the team responsible for Tax Policy and Legislation in India. Key policy initiatives in international tax during the period include drafting of statutory provisions relating to interest limitations (thin capitalization), secondary adjustments, Significant Economic Presence (SEP) and rules relating to Country by Country report and Master file.

Mr. Das holds a Post Graduate Diploma in Public Policy and Management from Indian Institute of Management, Bangalore (2010) and a Post Graduate Degree in International Relations from Jawaharlal Nehru University, New Delhi (1990). Mr. Das has written and published articles on value creation and its relevance for the Allocation of Taxing Rights and on whether Arm's-Length-Principle is losing its authority.



Mary Baine

Director of Tax Programs at
the African Tax Administration Forum (ATAF)

Moderator: Future Directions

Ms. Mary Baine is the Director of Tax Programmes at the African Tax Administration Forum.

ATAF is an African inter-governmental organization leading tax administration reform, and that facilitates peer support among tax administrations in mobilizing greater domestic resources through improved efficiency and effectiveness in their operations.

Her work includes the supervision of multiple technical assistance engagements that include but aren't limited to; VAT as a flagship tax, and Multiple Country Programs featuring Transfer Pricing and Exchange of Information interventions in ATAF's Technical Assistance Program.

Prior to this assignment, Ms. Baine served as the Permanent Secretary of the Ministry of Foreign Affairs and Co-operation of the Republic of Rwanda, and as Commissioner-General of the Rwanda Revenue Authority, having grown through the ranks of the different tax departments over a 17-year period.



Alvin Mosioma

Executive Director, Tax Justice Network-Africa (TJNA)

Panelist: Future Directions

Mr. Alvin Mosioma is the founding Executive Director of Tax Justice Network Africa, a Pan-African Advocacy and Research Network of 31 members in 16 African countries working on Tax Justice and curbing of IFFs from Africa.

He is a leading voice on tax policy in Africa and has spear headed numerous civil society campaigns in Africa since 2007. He has previously served as the Chair of the Financial Transparency Coalition (FTC) and was nominated to join the Open Government Partnership as a member of the steering committee.

He currently serves as a member of the advisory board for *Plateforme de Protection des Lanceurs d'Alerte en Afrique* (PPLAAF) and on the board of the coordinating committee of the *Global Alliance for Tax Justice* (GATJ). Over the past 15 years, he has published a number of articles and reports on fiscal policy in Africa and has also co-authored two books on taxation and development in Africa.

Mr. Mosioma holds a master's degree in economics from the Johannes Gutenberg University of Mainz. His special interest areas include fiscal policy, international taxation, financial regulation and natural resource governance.



Ben Dickinson

Head of the Global Relations and Development Division,
Centre for Tax Policy and Administration, OECD

Panelist: Future Directions

Mr. Ben Dickinson is Head of the Global Relations and Development Division in the OECD's Centre for Tax Policy and Administration.

In this role, he is responsible for ensuring that developing countries participate in OECD tax standard setting work and receive support to undertake implementation. Mr. Dickinson oversees the Tax Inspectors Without Borders initiative and the multilateral Global Relations Programme, which delivers capacity support through six Multilateral Tax Centres in Austria, China, Hungary, Korea, Mexico and Turkey.

He also manages the BEPS capacity building project designed to support the implementation of the latest international tax standards in developing countries. Working with the IMF, UN and World Bank, Mr. Dickinson represents the OECD in the Platform for Collaboration on Tax.

Mr. Dickinson joined the OECD in 2005 as Head of the Governance and Fragile States Unit in the Development Corporate Directorate, responsible for the Development Assistance Committee's work on economic governance, conflict, and security matters. He then established the OECD's horizontal work on taxation and development and illicit financial flows.

Prior to joining the OECD, Mr. Dickinson worked for the U.K. government as a senior governance specialist in Kenya, Pakistan, Indonesia, Russia, and Ukraine. He holds a master's degree in Development Economics from the University of Manchester.



Dang Ngoc Minh

Deputy Director General, General Department of Taxation,
Ministry of Finance, Vietnam

Panelist: Future Directions

Mr. Dang Ngoc Minh is Deputy Director General, General Department of Taxation (GDT), Ministry of Finance, Vietnam.

Mr. DANG Ngoc Minh has 30 plus years of working in the tax sector in Vietnam. Previously, he headed the International Taxation Department and the Large Taxpayer Department of the GDT.

He currently serves as a member of the Committee of Experts on International Cooperation in Tax Matters - Economic and Social Council - United Nations. He holds a Master's degree in Economics from the University of Michigan - Ann Arbor.



Marlene Nembhard Parker

Chief Tax Counsel, Legislation, Treaties and International Tax Matters, Tax Administration Jamaica

Panelist: Future Directions

Ms. Marlene Nembhard Parker is Tax Administration Jamaica's Chief Tax Counsel for Legislation, Treaties and International Tax Matters.

As TAJ's Chief Tax Counsel for Legislation, Treaties and International Tax Matters, Ms. Nembhard Parker advises the Commissioner General and the Minister of Finance on domestic legislation and international tax related matters. She is also Jamaica's Chief Negotiator for international tax agreements.

She holds a master's degree in International Taxation from the University of New South Wales, Australia. She is also a graduate of the Norman Manley Law School and holds a degree in Law and a degree in Public Administration from the University of the West Indies.

Ms. Nembhard Parker is Jamaica's representative to the OECD where she serves as delegate to the Global Forum on Transparency and Exchange of Tax Information. She is a member of the Steering Group of the Inclusive Framework on BEPS and has participated in several OECD panels and working groups. She also sits on the United Nations Committee of Experts on International Cooperation in Tax Matters, where she is the Coordinator of the Subcommittee on the Tax Treatment of Government-to-Government Aid.

Other professional activities included lecturing in International Taxation at the UWI's Mona School of Business and carrying out a short-term consultancy as a Subject Matter Expert for the IMF's Caribbean Regional Technical Assistance Centre (CARTAC).