

Arntzen de Besche and Baker McKenzie - in cooperation with the American Chamber of Commerce in Norway - have the pleasure of inviting you to a seminar on key issues in transfer pricing.

ARNTZEN  
de BESCHE

BAKER & MCKENZIE



#### Session A: Financial Transactions

Implementing robust and consistent transfer pricing policies for financial transactions backed up by appropriate documentation, both tax and commercial, is now far more important than before.

#### Session B: MAPS/APA

Director Legal Arthur Kristoffersen from the Ministry of Finance has negotiated transfer pricing disputes with governmental representatives from other states. Kristoffersen will speak about Norway's experiences with such negotiations, what the Ministry expects from tax payers in such cases and how Norway works with this in an OECD context.

#### Session C: IP & Tax

We will walk you through related "Life Cycle" issues including development, acquisition, exploitation and phase out. The discussion will focus on tax optimization of IP transactions. We will set this discussion within the context of the current business restructurings debate.

All sessions will provide an informal atmosphere where questions may be raised and vetted by the group.



Anders Heieren  
Partner  
Arntzen De Besche



Eyvind Sandvik  
Senior Lawyer  
Arntzen De Besche



Antonio Russo  
Partner  
Baker & Mckenzie



Caroline Silberztein  
Partner  
Baker & Mckenzie



Arthur Kristoffersen  
Director Legal  
Ministry Of Finance

#### Agenda

- 12.00 – 13.00 *Registration/lunch/refreshments*
- 13.00 – 13.15 Introduction
  - Anders Heieren, Partner, ARNTZEN DE BESCHE
- 13.15 – 14.15 Session A: "Financial Transactions"
  - Antonio Russo, Partner, BAKER & MCKENZIE
  - Anders Heieren, Partner/Eyvind Sandvik, Senior Lawyer on new draft proposal for interest deduction restrictions
- 14.15 – 15.15 Session B: "MAPS/APA"
  - Arthur Kristoffersen, Director Legal, MINISTRY OF FINANCE
  - Q&A. Experiences from BAKER & MCKENZIE
- 15.15 – 15.45 *Coffee break*
- 15.45 – 17.00 Session C: "IP & Tax"
  - Caroline Silberztein, Partner, BAKER & MCKENZIE
- *Drinks and canapés*

**Time:** 29 May 2013 12.00 – 17.00, followed by reception  
**Venue:** Arntzen de Besche offices, Bydgøy Allè 2, Oslo  
**Registration fee:** NOK 1500 to be invoiced via post

Kindly register your attendance at [https://www.deltager.no/seminar\\_290513](https://www.deltager.no/seminar_290513)