

Global Tax and Transfer Pricing Leadership Forum

September 20, 2006 • Microsoft Customer Briefing Center

EVENT DESCRIPTION:

Senior tax directors from multi national corporations gather for an interactive roundtable breakfast to discuss global tax and transfer pricing strategies.

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ATTENDEES FROM:

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AGENDA:

8:00 AM	Registration, Coffee & Continental Breakfast
8:00—8:20 AM	Introductions
8:20—9:45 AM	Implementing and IP Migration Structure <ol style="list-style-type: none">1. Determine Corporate Drivers: Treasury, Accounting2. Determine Benefit (Current or Deferred) & Tax Exposure3. Transfer IP: Sell, License, Ownership of Post Transfer IP4. Develop and Inter-company Pricing Model5. Consider Business Disruption6. Use of Offshore Cash – Consider Repatriation Strategies7. Develop/Consider an Exit Strategies
9:45—10:00 AM	Closing Comments