

Monday 3 November

	Track 1	Track 2	Track 3
07:15am	Continental Breakfast		
08:00am	Welcome and Introductions		
08:15am	Recent Developments in International Tax – U.S., Canada, Mexico, and Puerto Rico		
09:55am	Break		
10:00am	Entity Selection: Branch, CFC, or Check-the-Box?	Cross Border Real Estate	US Withholding Rules (non-FATCA & FATCA)
11:15am	Break		
11:20am	Introduction to Foreign Tax Credits	Transfer Pricing – Advanced	Indirect Tax in Mexico and Canada
12:40pm	Lunch		
1:35pm	Introduction to Anti-Deferral Provisions	Taxation of U.S. Expatriates	Canada – Income Tax
2:25pm	Tax Compliance for International Activities	International Gift & Estate	
3:15pm	Break		
3:25pm	Passive Foreign Investment Companies	Accounting for Income Tax	Mexico/Puerto Rico – Income Tax
4:15pm	An Introduction to International Merger and Acquisition Issues	Advanced Tax Issues – Inbound Investments	
5:30pm-7:30pm	Reception		

Tuesday 4 November

	Track 1	Track 2
07:30am	Continental Breakfast	
08:00am	OECD Initiative on Base Erosion and Profit Shifting (BEPS)	
09:40am	Break	
09:45am	Outbound & Inbound Investments – Case Studies	
11:00am	Break	
11:05am	An Introduction to Transfer Pricing	Foreign Tax Credits – Advanced Planning
12:25pm	Lunch	
1:35pm	An Introduction to the Taxation of Foreign Currency Transactions and Translations	International Merger and Acquisition Issues – Advanced Topics
2:25pm	IC-DISC Formation and Planning	Tax Treaties
3:15pm	Break	
3:20pm	Planning for Worldwide Effective Tax Rate	Anti-Deferral Provisions – Advanced Planning Techniques
4:10pm	Break	
4:15pm	Panel Discussion and Wrap-up	
5:00pm	End	