



**Regional Meeting on Tax and Digitalisation
For Asia and Pacific Countries
19–20 November 2019**

Auditorium B and C

**ADB Headquarters
Manila, Philippines**

Preliminary Draft Agenda

19 November 2019

Day 1: 09:00–05:00

All participants	
Time	Session
8:00–9:00 a.m.	Registration
9:00–9:15 a.m.	Introduction/Objectives of the meeting <ul style="list-style-type: none">• Welcome remarks, opening speeches and objectives of the meeting <p>The co-chairs [Name] will invite [Name] to open the Regional Meeting on Digitalisation for Asia and Pacific Countries. The OECD will then outline the agenda and highlight the objectives of the meeting.</p>
9:30–10:00 a.m.	Session 1 – Introduction to Base Erosion and Profit Shifting (BEPS), the Inclusive Framework, and its work on digitalisation of the economy <ul style="list-style-type: none">• OECD• ADB• Open discussion <p>Content:</p> <ul style="list-style-type: none">• Overview of the BEPS project• Governance of the Inclusive Framework• BEPS Action 1 Report and 2018 Interim Report on Digitalisation• 2019 Programme of work• Importance of developing countries' engagement• Recent developments <p>This session will provide an introduction to the BEPS project, the governance of the Inclusive Framework, its work on digitalisation of the economy and the organisation of the work. The session will also focus on the importance of having developing countries engaged in the process and the support available to them. The ADB will report the outcomes of recent workshop(s) on digitalisation carried out in the region.</p>
10:00–11:00 a.m.	Session 2 – Digitalisation of the Economy: Overview of Pillar One and Pillar Two proposals <ul style="list-style-type: none">• OECD• ADB• Open discussion <p>Content:</p> <ul style="list-style-type: none">• Revised nexus and profit allocation rules (Pillar One)

	<ul style="list-style-type: none"> • Global anti-base erosion proposal (Pillar Two) • Recent developments <p>The Inclusive Framework on Base Erosion and Profit Shifting (IF on BEPS) is currently working on the development of consensus-based, long-term solutions to the tax challenges arising from the digitalisation of the economy. The work is based on two pillars and is exploring: (i) potential solutions for determining the allocation of taxing rights (under Pillar One); and (ii) the design of a system to ensure that Multi-National Enterprises (MNEs) pay a minimum level of tax on profits (under Pillar Two).</p> <p>In this session, the OECD will provide an overview of the work under Pillar One and Pillar Two including the objectives, timelines, the organisation of the work and recent developments. ADB will provide a regional perspective to the session. Participants will be invited to provide input and feedback regarding the IF's work on digitalisation. They will have the opportunity to discuss tax challenges they may face regarding the digitalisation of the economy.</p>
11:00–11:30 a.m.	<i>Group photo and coffee break</i>
11:30 a.m.–1:00 p.m.	<p>Session 3 – Perspectives from business, civil society and academia</p> <ul style="list-style-type: none"> • Business • Civil society, academia <p>Content:</p> <ul style="list-style-type: none"> • Feedback on the Pillar One and Two proposals • Presentations by representatives from business and civil society <p>In this session, representatives of business, civil society and academia will be invited to deliver presentations in order to share their perspectives on addressing the tax challenges posed by digitalisation and provide feedback on the Pillar 1 and 2 proposals and recent developments.</p>
1:00–2:00 p.m.	<i>Lunch break</i>
<i>Government, International and Regional Organisations only</i>	
2:00–3:30 p.m.	<p>Session 4 – Economic analysis</p> <ul style="list-style-type: none"> • OECD • ADB • Open discussion <p>Content:</p> <ul style="list-style-type: none"> • Economic analysis of the potential impact of the Pillar One proposal • Economic analysis of the potential impact of the Pillar Two proposal

	<p>The OECD Secretariat is undertaking an economic analysis of the potential impact of the Pillar One and Pillar Two proposals. This economic analysis will aim to assess the potential impact of these proposals on the tax base, on the behaviours of taxpayers and governments, and on the global economy more generally.</p> <p>In this session, the OECD will present the work which it is currently carrying out in order to deliver an economic analysis to the Inclusive Framework, which is intended to inform the IF's future decision making. Participants will be invited to provide input and feedback regarding the work on the economic analysis of the potential impact of the proposals.</p>
3:30–4:00 p.m.	Coffee break
4:00–5:00 p.m.	<p>Session 5 – Bilateral meetings with the OECD and ADB</p> <p>The OECD and ADB will be available to discuss bilaterally, with interested delegates, specific issues that have not been addressed during the plenary sessions due to time restrictions. In case of interest shown by several delegates on the same subjects, small groups can be organised for the sake of efficiency.</p>
6:00 p.m.	Welcome cocktail

20 November 2019

Day 2: 9:00 a.m.–5:00 p.m.

Government, International and Regional Organisations only	
Time	Session
9:00–10:30 a.m.	<p>Session 6 – Pillar One</p> <ul style="list-style-type: none"> • OECD • ADB • Country representatives • Open discussion <p>Content:</p> <ul style="list-style-type: none"> • New profit allocation rules • New nexus rules • Implementation <p>This session will provide an in-depth review of the current proposals and recent developments under Pillar One of the IF's work on digitalisation regarding new profit allocation and nexus rules. In particular, the IF focusses on 1) exploring the different approaches to quantify relocated profit without creating double taxation (new profit allocation rules); 2) capturing a novel concept of business</p>

	<p>presence reflecting the transformation of the economy (new nexus rules); and 3) ensuring full implementation and efficient administration of the new taxing rights (implementation). ADB will provide a regional perspective to the session.</p> <p>Participants will be encouraged to provide input and feedback with regards to the Pillar One work including recent developments.</p>
10:30–11:00 a.m.	Coffee break
11:00 a.m.–12:30 p.m.	<p>Session 7 – Pillar One (Continued)</p> <ul style="list-style-type: none"> • OECD • ADB • Country representatives • Open discussion <p>Content:</p> <ul style="list-style-type: none"> • Policy objectives • Policy design considerations • Administration considerations
12:30–1:30 p.m.	Lunch break
1:30–3:00 p.m.	<p>Session 8 – Pillar Two</p> <ul style="list-style-type: none"> • OECD • ADB • Country representatives • Open discussion <p>Content:</p> <ul style="list-style-type: none"> • Income inclusion rule • Base eroding payments rule • Co-ordination • Recent developments <p>In this session, an in-depth review of the proposals under Pillar Two of the IF's work including recent developments will be discussed. Pillar Two focuses on the remaining BEPS issues and seeks to develop rules that would provide jurisdictions with a right to "tax back" where other jurisdictions have not exercised their primary taxing rights or a deductible payment is subject to low levels of effective taxation in the hands of the recipient. In particular, the session will focus on the development of various rules such as the income inclusion rule, the switch-over rule, the undertaxed payments rule, and the subject to tax rule, while taking into account rule co-ordination, simplification, and compatibility with international obligations.</p>

	ADB will provide a regional perspective to the session.
3:00–3:30 p.m.	Coffee break
3:30–4:30 p.m.	<p>Session 9 – Pillar Two (Continued)</p> <ul style="list-style-type: none"> • OECD • ADB • Country representatives • Open discussion <p>Content:</p> <ul style="list-style-type: none"> • Policy objectives • Policy design considerations • Administrative considerations • Economic analysis and impact assessment
4:30–5:00 p.m.	<p>Session 10 – Conclusions and next steps</p> <ul style="list-style-type: none"> • Summary of the main outcomes of the Regional Meeting on Tax and Digitalisation • Closing remarks <p>This session will summarise and discuss the main outcomes of the Regional Meeting on Tax and Digitalisation including next steps.</p>
5:00–6:00 p.m.	<p>Session 11 – Bilateral meetings with the OECD and ADB</p> <p>The OECD and ADB will be available to discuss bilaterally, with interested delegates, specific issues that have not been addressed during the plenary sessions due to time restrictions. In case of interest shown by several delegates on the same subjects, small groups can be organised for the sake of efficiency.</p>