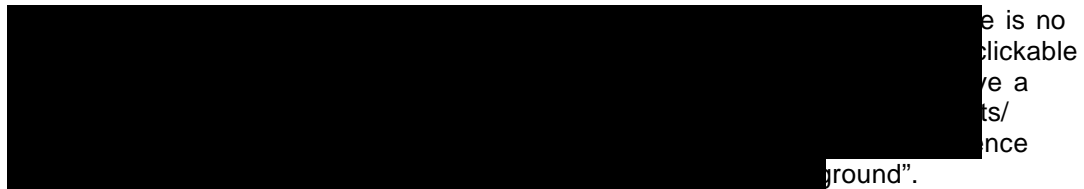


Informal Secretariat Update of Organization of Work
(E/C.18/2015/1) for Tax Committee Annual Session 29-
October As of 14 October

Committee of Experts on International Cooperation
in Tax Matters
Eleventh session
Geneva, 19-23 October 2015



Provisional organization of work



Date	Item
Monday, 19 October 2015	
9-10 a.m.	Registration of participants
10-10.45 a.m.	1 Opening of the session by the Chair of the Committee
	2 Adoption of the agenda and organization of work
	3 Discussion of substantive issues related to international cooperation in tax matters: (a) Issues related to the updating of the United Nations Model Tax Convention:
10.45-11.45 a.m.	3 (a) (i) Article 1 (Persons covered): application of treaty rules to hybrid entities; -Note by the Secretariat on "New provision for the United Nations Model Double Taxation Convention between Developed and Developing Countries to address the application of tax treaties to payments made through hybrid entities" (E/C.18/2015/3)
11.45 a.m.-12 p.m.	

Date	Item
------	------

12-1 p.m.	3 (a) (ii) Article 5 (Permanent establishment): the meaning of “connected projects” (Presentation Viktoria Wöhre) Article 5: the meaning of “the same or a connected project” (E/C.18/2015/CRP.9) (clean copy, marked up copy) (Presme ÌÒ€rV.038 T3 0 Td (up)Tj 0 Tc 0 Tw 3 0.001 Tw 2.627 0 Td [
-----------	--

Date	Item
4-4.45 p.m.	3 (b) (v) Capacitybuilding - Note by the Secretariat on “Capacity development progræ in international tax cooperation(E/C.18/2015/4 - Note by the Secretariat on “Capacity development progræ in international tax cooperation(E/C.18/2015/5 - United Nations Capacity Development Programme on International Tax Cooperation, Progress Report (E/C.18/2015/CRP.10)PresentationDominika Halka and Harry Toning
4.45-5 p.m.	Coffeebreak
5-6 p.m.	3 (b) (v) Capacitybuilding (continued)
	
Wednesday, 21 October	
10-11.30 a.m.	3 (a) (iv) Base erosion and profit shifting Subcommittee on Base Erosion and Profit Shifting for Developing Countries(E/C.18/2015/CRP.11)Presentation Alexander Trepelkov) (Presentation Brian Arnold and Hugh

Date	Item
	b. Software payment related issues (Presentation Anna Binder)
Thursday, 22 October	
10-11.45 a.m.	3 (b) (i) Issues for the next update of the Practical Manual on Transfer Pricing for Developing Countries - Subcommittee on Article 9 (Associated Enterprises): Transfer Pricing (E/C.18/2015/CRP.1) - Possible Joint Actions by the Subcommittee on Article 9 (Associated Enterprises): Transfer Pricing and the Subcommittee on Extractives Industries Taxation Issues for Developing Countries (E/C.18/2015/CRP.3)
11.45-12 p.m.	Coffee break
12-1 p.m.	3 (b) (iii) Taxation of the extractive industries Report of Coordinator: Subcommittee on Extractive Industries Taxation Issues for Developing Countries (E/C.18/2015/CRP)2 (Presentation Eric Mensah) - Attachment 1: Overview Note on Extractive Industries Taxation Issues -

Date	Item
4.30-6 p.m.	3 (a) (vi) Article 26 (Exchange of information): proposed Code of Conduct United Nations Code of Conduct on Cooperation in Combating International Tax Evasion (E/C.18/2015/CRP.4) (cleancopy, markedup copy)
Friday, 23 October	
10-11.45 a.m.	3 (b) (ii) Manual for the Negotiation of Bilateral Tax Treaties between Developed and Developing Countries Practical Manual for the Negotiation of Bilateral Tax Treaties between Developed and Developing Countries (Presentation Wolfgang Lasar)
11.45 a.m.-12 p.m.	Coffee break
12-1 p.m.	3 (b) (iv) Taxation of development projects
1-3 p.m.	Lunch break
3-4.30 p.m.	3 (b) (vii)