

HOW WOULD THE UN FRAMEWORK TAX CONVENTION WORK IN PRACTICE?

Case Studies on Planning and Policy in the Wake of the Convention

ONLINE WEBINAR

Date: November 3, 2026

Time: 1:00PM Bangkok | 2:00PM Singapore | 3:00PM Tokyo |
6:00AM GMT | 8:00AM SAST | 9:00AM EAT |
1:00AM EST | 10:00PM PST (-1day)



The draft UN Framework Convention on International Tax Cooperation (“FTC”), which is expected to be finalized next year, is undeniably a historic development with major potential implications for global tax governance. However its real world consequences remain much less explored.

In this practical webinar, international tax law expert Edwin Vanderbruggen moves beyond the policy debate to examine how the FTC (based on the present draft) could operate in practice. Using practical examples and case studies, he explores how the emerging framework could interact with existing tax treaties, BEPS Pillar Two and international tax disputes.

HIGHLIGHTS

- **Existing and future DTAs:** Case studies showing how the FTC could affect existing and future DTAs, including the different scenarios that still lie ahead in the Intergovernmental Negotiating Committee debates.
- **Remote and digital services:** Practical examples of potential disputes over the taxation of digital and remote services once the FTC and its protocols come into force.
- **Transfer pricing vs. Economic contribution:** What could this concept actually mean in practice? Examples of allocating value among markets, consumers and data, and how these approaches compare with the OECD Transfer Pricing Guidelines.
- **Tax and sustainable development:** What are the practical implications of the commitment to an “international tax system for sustainable development”?
- **Obligations affecting taxpayers:** If the FTC were adopted in its current form, what obligations would actually arise for its parties, and which of these could affect taxpayers directly?
- **Tax disputes:** Does the tax dispute protocol create new obligations for states? If so, what exactly are they? Case studies on how they could affect current international tax disputes.
- **Special concerns for airlines, shipping companies, digital service providers, and other international businesses.**

PRESENTER



Edwin Vanderbruggen

Senior Partner
Andersen in Cambodia/Vietnam
International tax expert

Edwin Vanderbruggen is a leading expert in international taxation and tax treaties, with more than 25 years of experience advising multinational enterprises, governments and international institutions across Southeast Asia. He holds senior advisory and leadership positions with Andersen in Cambodia and Vietnam and VDB Loi, advising on cross-border taxation, tax policy and international tax matters across several jurisdictions in the region.

Edwin is the author of the first monograph on the UN Framework Tax Convention, published by Springer, and has published extensively on international taxation in leading academic journals. He has lectured on international taxation at universities in Europe and Asia, and currently teaches at the Foreign Trade University in Hanoi, Vietnam. He has also acted as an expert witness before courts and tribunals.

HOW TO REGISTER AND ATTEND

Registration is free of charge. Send your information (name, position, company, email, contact number) to **Kathryn Ortega** (kathryn.ortega@kh.Andersen.com) or scan the QR code for online registration.



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