

A conference presented by the IBA Taxation Section



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8th Annual IBA Finance & Capital Markets Tax Conference



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28–29 January 2019, etc.venues St Paul's, London, England

Topics include:

- Brexit and UK financial developments
- Patent Box legislation
- US developments relating to financing and capital markets
- Transfer pricing
- Funds update
- New financing techniques
- Financing in Asia Pacific
- Digital taxation/economy
- Financial institutions
- Tax director's panel
- Cross border M&A – financing focused
- Cryptocurrency
- Tax administration
- Finding purpose in life: avoiding abuse under MLI, EU Directives and treaties
- What is happening in holding company jurisdictions

2018 Testimonials:

'Up-to-date information covering lots of jurisdictions'

'If there is one international tax conference a year that I do not want to miss, it's this one'

'I enjoyed very much every moment of the conference'

'The most technical and practical 2 days I spend each year – learning curve time – a tremendous amount of bang for your buck.'

'Excellent and timely topics. I learned a lot.'

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Programme

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Sandy Bhogal *Gibson Dunn & Crutcher, London*

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Albert Collado *Garrigues, Barcelona*

Ana-Lucia Ferreyra *Pluspetrol, Buenos Aires; Co-Chair, IBA Taxes Committee*

Reto Heuberger *Homburger, Zurich; Vice Chair, IBA Taxes Committee*

Margriet Lukkien *Loyens & Loeff, Amsterdam; Co-Chair, IBA Taxes Committee*

Raul-Angelo Papotti *Chiomenti, Milan; Website Officer, IBA Taxes Committee*

Jonathan Schwarz *Temple Tax Chambers, London*

Gordon Warnke *KPMG, New York*

Monday 28 January

0730 – 1800 **Registration**

0800 – 0930 **Brexit and UK financial developments**

- EU treaty aspects
- Impact on M&A and outward investment
- Impact on inward investment from a US standpoint
- Impact on inward investment from a European standpoint
- Corporate finance/capital markets aspects
- State aid and any residual after-effects

Session Chair

Steve Edge *Slaughter and May, London*

Speakers

Sandy Bhogal *Gibson Dunn & Crutcher, London*

Torsten Engers *Flick Gocke Schaumburg, Frankfurt*

David Jervis *Eversheds Sutherland, London*

Yash Rupal *Linklaters, London*

Jonathan Schwarz *Temple Tax Chambers, London*

Reporter

Sjoerd Stokmans *Van Doorne, Amsterdam*

0930 – 1030 **Patent Box legislation**

IP holding and financing post BEPS:

- Global tax developments impacting on where to locate IP
- Where should IP be developed, held and exploited?
- How does financing of a transaction affect the IP structuring?
- Are all IP boxes now the same?
- Impact of US GILTI and FDII regime
- EU DAC6 mandatory disclosure obligations – effect on structuring

Session Chair

James Somerville *A&L Goodbody, Dublin*

Speakers

Bernadette Accili *LMS Studio Legale, Milan*

Willem Bongaerts *Bird & Bird, The Hague*

Robert Jean Kloprogge *AKD NV, Amsterdam*

Ilazki Otaegi Amundarain *Garrigues, Bilbao*

1030 – 1100 **Coffee/tea break**

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Monday continued

1100 – 1230 **US developments relating to financing and capital markets**

- Impact of new US participation exemption on markets
- Impact of new US Base Erosion and Anti-Abuse Tax (BEAT) and changes to US 163(j) (earnings stripping) in multi-national financing of US operations
- New US (related party) anti-hybrid rules and how these compare/interact with BEPS Action 2 – impact on double-dip structures
- Impact of the interrelationship of Global Intangible Low-Taxed Income (GILTI) and Subpart F on financing structures
- Changes in the definition of a CFC and possible impacts thereof
- Changes in the corporate inversion rules
- Is cash pooling still possible?

Session Chair

Kimberly Blanchard *Weil Gotshal & Manges, New York*

Speakers

Peter Blessing *KPMG, Stamford, Connecticut*

Paul Carman *Chapman and Cutler, Chicago, Illinois*

David Hardy *Osler Hoskin & Harcourt, New York*

Carol Tello *Eversheds Sutherland, Washington DC*

1230 – 1330 **Lunch**

1330 – 1430 **Transfer pricing**

- Discussion of OECD 2018 draft financial transactions TP guidelines, including TP on group internal guarantees and cash-pooling
- Hidden equity (re-characterised group loans) and appropriate interest payments
- TP and EU country by country reporting
- Permanent establishments
- OECD / EU dispute resolution: MAP, arbitration in TP cases
- Penal aspects to inappropriate TP

Session Chair

Pascal Hinny *Lenz & Staehelin, Zurich*

Speakers

Annabelle Bailleul-Mirabaud *CMS Francis Lefebvre, Neuilly-sur-Seine; Membership Officer Europe, IBA Taxes Committee*

Murray Clayson *Freshfields Bruckhaus Deringer, London*

Ryan J Kelly *Alston & Bird, Washington DC*

Raul-Angelo Papotti *Chiomenti Studio Legale, Milan; Young*

Lawyers' Committee Liaison Officer, IBA Private Client Tax Committee

Reporter

Rachel Fox *William Fry, Dublin*

1430 – 1500 **Coffee/tea break**

1500 – 1615 **Funds update**

Challenges, risk and opportunities in Private Investment Funds, Public Funds and Opportunity Zone Funds

Session Chair

Brenda Coleman *Ropes & Gray, London*

Speakers

Margriet Lukkien *Loyens & Loeff, Amsterdam; Co-Chair, IBA Taxes Committee*

Ron Nardini *Akin Gump Strauss Hauer & Feld, New York*

David Weisner *Brown Brothers Harriman & Co, Boston, Massachusetts*

Reporter

Mariana Eguarte Morett *Sanchez Devanny, Mexico City*

1615 – 1730 **New financing techniques**

- What survives BEAT, interest barrier, anti-hybrid rules, and the like?
- Impact of ATAD, GAAR, DOTAS, DAC6
- Upcoming legislative developments
- Use of interest equivalents – rent, royalties, securities loans, partnership interests
- Use of equity rather than debt to minimise global tax burden
- Irish non-trading branches
- Irish section 110 companies
- PECs

Session Chair

Erika Nijenhuis *Cleary Gottlieb Steen & Hamilton, New York*

Speakers

Adam Blakemore *Cadwalader Wickersham & Taft, London*

Ailish Finnerty *Arthur Cox, Dublin*

Mark Leeds *Mayer Brown, New York*

Reporter

Pierre-Régis Dukmedijan *Simmons & Simmons, Luxembourg City*

1730 – 1830 **Financing in Asia Pacific**

Australia, China, India, Japan and Singapore

- Impact of BEPS
- Thin capitalisation and withholding tax considerations
- Interest deduction barriers
- Divestment-exit considerations
- Proliferation of unilateral measures – domestic laws viz; anti-avoidance measures
- Exchange control and regulatory challenges – the need to identify and address at the planning stage



Exhibitor

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Monday continued

Session Chair

Aseem Chawla *ASC Legal, New Delhi; Secretary, IBA Taxes Committee*

Speakers

Su-Mei Ban *GSM Law, Singapore; Conference Coordinator, IBA Taxes Committee*

Yushi Hegawa *Nagashima Ohno & Tsunematsu, Tokyo*

Elissa Romanin *MinterEllison, Melbourne, Victoria; Scholarship Officer, IBA Taxes Committee*

Eric Roose *Withers, Singapore*

1830 – 1930 **Drinks Reception**

Gibson Hall

13 Bishopsgate

London EC2N 3BA

This event is open to all registered delegates. No transport will be provided.

1930 **Conference Dinner**

Gibson Hall

A magnificent converted banking hall and Grade I listed building in the heart of the City of London.

Ticket price: £100

Entry is by ticket only. Subject to availability. No transport will be provided.

Continuing Professional Development/Continuing Legal Education

*The number of CPD/CLE hours available may vary depending on the rules applied by the members' bar association/law society on time recording criteria.

For conference delegates from jurisdictions where CPD/CLE is mandatory, the IBA will provide a Certificate of Attendance for the conference. Subject to CPD/CLE requirements, this can be used by conference delegates to obtain the relevant number of hours' accreditation.

A CPD/CLE Certificate of Attendance is available to conference delegates on request. Please ask at the IBA conference registration desk for information on how to obtain the certificate.

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0730 – 1800 **Registration**

0800 – 0930 **Digital taxation/economy**

- Digital business models
- Multilateral and unilateral approaches
- Interim versus long-term proposals
- Turnover taxes/withholding taxes/virtual permanent establishments/other regimes
- Profit allocation
- Transfer pricing
- Tax treaties
- Impact on multinationals
- Implementation challenges

Session Chair

Edward Wei *Cadwalader Wickersham & Taft, New York*

Speakers

Michel Collet *CMS Francis Lefebvre, Paris*

Guadalupe Diaz-Sunico *Cuatrecasas, Barcelona*

Erika Jupe *Osborne Clarke, Bristol/London*

Stefano Petrecca *Macchi di Cellere Gangemi, Rome*

Reporter

Barry McGettrick *Matheson, Dublin*

0930 – 1030 **Financial institutions**

- Mandatory disclosure rules, including application of DAC6, FATCA, and AIA
- US branch activities of multinational banks
- Refund ability of withholding taxes levied on subsidiaries used as hedging positions (applies to Swiss and foreign institutions)
- Possible changes of Swiss withholding tax to a paying agent system
- Partial elimination of stamp tax in Switzerland
- The impact of UK bank measures
- Recent developments in Italy, including around ATAD I and ATAD II
- How to practically deal with increased beneficial ownership and treaty abuse risks

Session Chair

Dan Luchsinger *Covington & Burling, Washington DC*

Speakers

Stefano M Ceccacci *UniCredit, Milan*

Michael Nordin *Schellenberg Wittmer, Zurich*

Federica Pitrone *Intesa Sanpaolo, Milan*

Angela Shah *Nomura International, London*

1030 – 1100 **Coffee/tea break**

1100 – 1200 **Tax directors' panel**

- Assessing tax risk in an increasingly volatile political environment
- The effect of BEPS and country by country reporting on a multinational's tax planning
- The effect of state aid investigations
- Tax provisions on the financial statements
- Handling changes to the tax compliance burden
- Impact of digitalisation on processes in tax departments of companies
- What tax directors really need to hear from their external tax advisors

Session Chair

Jeff Trinklein *Gibson Dunn & Crutcher, London*

Speakers

Stuart Chessman *Vivendi, New York*

Jan Martin *Baker Hughes, a GE Company, London*

Charlie Vaughan-Read *Johnson & Johnson, London*

Saibh Young *Lloyds Banking Group, London*

Reporter

Philip Tully *Matheson, Dublin*

1200 – 1300 **Lunch**

1300 – 1400 **Cross border M&A – financing focused**

- Overview of impact of European and US tax reform on cross border M&A financing
- Leverage push down considerations
- Earnings stripping/thin cap developments (including under ATAD I and US section 163(j))
- Debt, equity, leasing and other financing approaches
- Repatriation of earnings
- Hybrid instruments (including under ATAD II and US section 267A)
- Other M&A financing considerations and developments of interest

Session Chair

Gordon Warnke *KPMG, New York*

Speakers

Reto Heuberger *Homburger, Zurich; Vice Chair, IBA Taxes Committee*

Michael Lane *Slaughter and May, London*

Michael Molenaars *Stibbe, Amsterdam*

Eric Wang *Sullivan & Cromwell, New York*

Reporter

Clemens Willvonsender *Binder Grosswang Rechtsanwälte GmbH, Vienna*



Tuesday continued

1400 – 1500 **Cryptocurrency**

- Tax consequences of investment in cryptocurrency, including the legal nature of cryptocurrency in different countries
- Treatment of 'forks' (offshoot cryptocurrencies)
- Initial coin offerings (ICOs), including the treatment of Simple Agreement for Future Tokens (SAFTs)
- Mining
- Enforcement activities of revenue authorities
- Prospect of new legislation or administrative guidance

Session Chair

Lisa Zarlenga *Steptoe & Johnson, Washington DC*

Speakers

Jonathan Cooklin *Davis Polk & Wardwell, London*

Nils Harbeke *Pestalozzi, Zurich*

Raquel Novais *Machado Meyer, São Paulo*

Rebeca Rodriguez *Cuatrecasas, Madrid*

Reporter

Ceri Stoner *Wiggin, Cheltenham*

1500 – 1530 **Coffee/tea break**

1530 – 1700 **Tax administration**

- Cross-border audits and joint audits
- Key features of OECD International (Tax) Compliance Assurance Programme (ICAP) tax disclosure (EU-AAC 6)
- Tax disputes and litigation
- Role of tax administration – difference in outlook developing economics versus emerging economies
- MLI interplay with domestic laws and BEPS
- MAP, PAA
- Increasing enforcement actions and proposed multinational cooperation among tax authorities
- Aggressive tax planning disclosure
- Implementation of first and second ATAD directives from an audit perspective
- Is arbitration future of contentious practice – scope of arbitration under MLI
- New mandatory automatic exchange of information for reportable cross-border arrangements

Session Chair

Sam Kaywood *Alston & Bird, Atlanta, Georgia*

Speakers

Walter Boss *Bratschi AG, Zurich*

Jason Collins *Pinsent Masons, London*

Pia Dorfmueller *P+P Pöllath + Partners, Frankfurt*

Diogo Duarte de Oliveira *Stibbe, Luxembourg*

Heather Gething *Herbert Smith, London*

Guglielmo Maisto *Maisto e Associati, Milan*

Reporter

Marco Ottenwaelder *P+P Pöllath + Partners, Frankfurt*

1700 – 1745 **Finding purpose in life: avoiding abuse under MLI, EU Directives and treaties**

Case studies covering:

- GAAR under domestic law, the MLI and the ATAD: differences and similarities
- How do SAAR clauses relate to GAAR clauses under domestic law, the MLI and the ATAD.
- Recent case law: EU and domestic
- 'One of the principal purposes' – likely interpretation
- PPT versus GAAR: principal versus main purpose
- PPT in MLI – reasonableness test
- Curing abuse with substance?
- Interpretation source country leading? MAP?
- GAAR and the rule of law. How far can the administration and the courts go in applying GAAR rules?
- Relation between the PPT/GAAR rules and the beneficial ownership requirement

Session Chair

Jan van den Tooren *Hamelink & Van den Tooren, Amsterdam*

Speakers

Ashley Greenbank *Macfarlanes, London*

Wilhelm Haarmann *McDermott Will & Emery, Frankfurt*

Andrea Silvestri *BonelliErede, Milan*

Barbara Worndl *Aird & Berlis, Toronto, Ontario*

Reporter

Lars Gläser *Schindler Attorneys, Vienna*

1745 – 1830 **What is happening in holding company jurisdictions?**

Luxembourg, the Netherlands, Switzerland and the UK

- Requirements for substance / PPT for holding location
- CFC rules / double taxation risks
- Participation deduction regimes
- Brexit considerations and impact of holding company choices

Session Chair

Clemens Philipp Schindler *Schindler Attorneys, Vienna*

Speakers

Sean Finn *Latham & Watkins, London*

Jean Schaffner *Allen & Overy, Luxembourg*

Susanne Schreiber *Bär & Karrer, Zurich*

Pieter van den Brink *NautaDutilh, Amsterdam*

Reporter

Antti Lehtimaja *Krogerus, Helsinki*

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The organisers may at any time, with or without giving notice, in their absolute discretion and without giving any reason, cancel or postpone the conference, change its venue or any of the other published particulars, or withdraw any invitation to attend. In any case, neither the organisers nor any of their officers, employees, agents, members or representatives shall be liable for any loss, liability, damage or expense suffered or incurred by any person, nor will they return any money paid to them in connection with the conference unless they are satisfied not only that the money in question remains under their control but also that the person who paid it has been unfairly prejudiced (as to which, decision shall be in their sole and unfettered discretion and, when announced, final and conclusive).

Information

Date

28–29 January 2019

Venue

etc.venues St Paul's
200 Aldersgate
London, EC1A 4HD
England
Tel: +44 (0)20 3735 7700

Fees

Online registrations received:

	on or before 21 December	until 22 January
IBA member	£550	£640
IFA member	£550	£640
Non-member*	£685	£775
Young lawyers (under 30 years)	£415	£775
Academics/judges (full-time)	£415	£775
Public lawyers	£415	£775
Corporate counsel**	£495	£775
Conference dinner	£100	£100

After **22 January** registrations must be received in hard copy at the IBA office.

Hard copy registration forms and fees received:

	on or before 21 December	after 21 December
IBA member	£610	£710
IFA member	£610	£710
Non-member*	£760	£860
Young lawyers (under 30 years)	£460	£860
Academics/judges (full-time)	£460	£860
Public lawyers	£460	£860
Corporate counsel**	£550	£860
Conference dinner	£100	£100

* By paying the non-member fee, we welcome you as a delegate member of the IBA for the year in which this conference is held, which entitles you to the following benefits:

- 1) Password access to certain parts of the IBA website.
- 2) Receipt of *IBA E-news* and access to online versions of *IBA Global Insight*.
- 3) Pay the member rate for any subsequent conference registrations for this calendar year.

** A reduced rate is offered to IBA Corporate Group Members. Please register online to obtain a 25 per cent discount on the IBA member fee.

If you would like to become a full or general member of the IBA, which includes membership of one committee or more – and inclusion in and access to our membership directory – we encourage you to do so now in order to register for this Conference at the member rate. You can find full details of how to join at www.ibanet.org.

A reduced rate is offered to lawyers who are over the age of 65, have been an IBA member for more than 20 years and are no longer practising law.

Language

All working sessions and conference materials will be in English.

How to register

Register online by **22 January 2019** at www.ibanet.org/conferences/conf936.aspx and make payment by credit card to avail of the ten per cent online registration discount or complete the attached registration form and return it to the Conference Department at the IBA together with your bank transfer/cheque payment. You should receive an email confirmation of your registration within five days; if you do not, please contact emily.bower@int-bar.org.

Full payment must be received in order to obtain your Conference documentation.

Fees include:

- Attendance at all working sessions
- Conference materials, including any available speakers' papers submitted to the IBA before 18 January
- Access to the above Conference working materials from the IBA website (www.ibanet.org) approximately seven days prior to the Conference
- Access to mobile delegate search application
- Lunch on Monday and Tuesday
- Tea and coffee during breaks
- Drinks reception on Monday
- VAT currently at 20 per cent

Please note that registrations are not transferable.

List of participants

In order for your name to appear in the list of participants, which will be distributed at the Conference, your registration form must be received by **22 January** at the latest.

Mobile delegate search application

All registered delegates will receive a printed list of participants at the Conference; however, delegates are now also able to use the mobile delegate search. This application has been developed to aid networking by giving delegates instant access to an up-to-date list of their fellow attendees, and comes with the added benefit of a built-in messaging service. All registered delegates with an internet or Wi-Fi-enabled device will have access, using their IBA username and password. Simply visit: m.ibanet.org/conf936

Registration confirmation

All documentation regarding your attendance at the Conference can now be obtained from the IBA website. Upon receipt of your payment for the Conference a confirmation email will be sent containing instructions on how to download the documents. Registration confirmation will not be distributed by post.

Photography and filming

Certain sessions and/or social functions may be photographed and/or filmed and some of this content may be used for future IBA marketing materials, member communications, products or services. Should you have any concerns with regard to this, or do not wish to be featured in any of these materials please contact the IBA Marketing Department at ibamarketing@int-bar.org.

Promotional literature

Please note that no individual or organisation may display or distribute publicity material or other printed matter during the Conference, unless by prior arrangement with the IBA. Organisations and companies wishing to discuss promotional opportunities should contact the IBA Sponsorship Department at andrew.webster-dunn@int-bar.org.



Payment of registration fees

Pounds sterling: by cheque drawn on a UK bank and in favour of the International Bar Association. Please send to: 4th Floor, 10 St Bride Street, London EC4A 4AD, United Kingdom.

OR by bank transfer to the IBA account number: 13270222 (Sort Code 56-00-03) at the National Westminster Bank, St James's & Piccadilly Branch, 208 Piccadilly, London W1A 2DG, United Kingdom. SWIFT address NWBKGB2L, IBAN GB05NWBK56000313270222

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Please ensure that a copy of the bank transfer details is attached to your registration form.

Use the exchange rate prevailing at the time of registration.

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OR by bank transfer to the IBA account at the National Westminster Bank, St James's & Piccadilly Branch, 208 Piccadilly, London W1A 2DG, United Kingdom. SWIFT address NWBKGB2L, IBAN GB55NWBK60730101286498

Please ensure that a copy of the bank transfer details is attached to your registration form.

Use the exchange rate prevailing at the time of registration.

Cancellation of registration or social functions

If cancellation is received in writing at the IBA office by 28 December, fees will be refunded less a 25 per cent administration charge. Refunds will be made minus any monies owed to the IBA.

We regret that no refunds can be made after this date. Registrations or social function bookings received after 28 December will not be eligible for any refund of fees. Please note that NO exception will be made to this policy. Should you have difficulties in obtaining your visa and are not able to attend the Conference this cancellation policy will still apply.

Upon submission of your completed Conference registration form to the IBA you are considered 'registered' pending payment. Please note that the cancellation terms and conditions as indicated will apply as soon as your registration is received.

Provided you have cancelled your registration to attend an IBA conference in accordance with the terms of the 'cancellation of registration' clause included in the 'Information' section of the relevant conference programme, you must then confirm to us in writing at the IBA office as soon as possible, but in no event later than one year (12 calendar months) from the date of any such conference, all necessary details to enable any reimbursement owed to you to be paid. We regret that no refunds will be made after the date that is one year (12 calendar months) after the date of the relevant conference.

Travel arrangements and visas

Participants are responsible for making their own travel arrangements. It is recommended that you check your visa requirements with your local embassy or consulate. **We are unable to dispatch visa invitation letters to support your visa application prior to receipt of your registration form and full payment of registration fees.**

Please apply for your visa in good time.

Online credit card payments: by Visa, MasterCard or American Express. **No other cards are accepted.**

PLEASE ENSURE THAT YOUR NAME AND 'CON936LONDON' APPEAR ON ANY TRANSFER OR DRAFT.

No deductions or withholdings

All fees payable to us by you in accordance with the terms contained in this 'Information' section shall be paid free and clear of all deductions or withholdings whatsoever.

If any deductions or withholdings are required by law to be made from any fees payable to us by you under the terms contained in this 'Information' section you shall pay such sum as will, after the deduction or withholding has been made, leave us with the same amount as we would have been entitled to receive in the absence of any such requirement to make a deduction or withholding.

If we obtain the benefit of any tax credit or other relief by reference to any such deductions or withholdings, then we shall repay to you such amount as, after such repayment has been made, will leave us in no worse position than we would have been had no such deductions or withholdings been required.

Conference sell-outs

The IBA places its conferences in venues of a suitable size for each event; however, there are times when our conferences may sell out. Should this happen, prospective delegates will be informed and a waiting list will operate. The waiting list will function on a 'first come, first served' basis, subject to receiving registered delegate cancellations. The IBA will not be liable for any travel or accommodation expenses incurred by an individual who travels to a conference without a confirmed place at the event.

Hotel accommodation

Below is a list of hotels located near etc.venues St Paul's. Please contact the hotel of your choice directly to find out rates, availability and to make your reservation.

Apex London Wall Hotel

7-9 Copthall Ave, London EC2R 7NJ
Tel: +44 (0) 20 7562 3030

www.apexhotels.co.uk/apex-london-wall-hotel

The Grange St Paul's

10 Godliman St, London EC4V 5AJ
Tel: +44 (0) 20 7074 1000

www.grangehotels.com/hotels-london/grange-st-pauls/

Malmaison London

18-21 Charterhouse Square, Clerkenwell, London EC1M 6AH
Tel: +44 (0)20 3750 9402

www.malmaison.com/locations/london/

The Ned

27 Poultry, London EC2R 8AJ
Tel: +44 (0) 20 3828 2000

www.thened.com/rooms-and-suites

Unauthorised accommodation agents

It has been brought to our attention that there are multiple companies contacting past attendees, claiming to represent the IBA, offering 'assistance' with registration and hotel bookings.

They are operating by cold-calling and spamming companies whose names have appeared on previous List of Participants, Programmes and Sponsorship recognition. The only Accommodation Agent the IBA works with is Judy Lane ICS. Judy Lane ICS do not contact delegates on behalf of the IBA without delegates making initial contact. Please ignore any communication that does not come directly from the IBA or Judy Lane ICS.

Social programme

Monday 28 January

1830 – 1930 Drinks Reception

Gibson Hall, 13 Bishopsgate, London EC2N 3BA

This event is open to all registered delegates.

No transport will be provided.

1930 Conference Dinner

Gibson Hall

A magnificent converted banking hall and Grade I listed building in the heart of the City of London.

Ticket price: £100

Entry is by ticket only. No transport will be provided.

Social event places cannot be guaranteed unless payment has been received before **23 January**, subject to availability.

ANNUAL CONFERENCE OF THE INTERNATIONAL BAR ASSOCIATION



IBA 2019

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SEOUL, SOUTH KOREA, 22–27 SEPTEMBER



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International Bar Association

the global voice of the legal profession

The International Bar Association (IBA), established in 1947, is the world's leading organisation of international legal practitioners, bar associations, law firms and law societies.

The IBA influences the development of international law reform and shapes the future of the legal profession throughout the world. It has a membership of more than 80,000 individual lawyers and more than 190 bar associations and law societies spanning over 170 countries.

Inspired by the vision of the United Nations, the IBA was founded in the same spirit, just before the Universal Declaration of Human Rights was proclaimed in 1948.

The IBA covers all practice areas and professional interests, providing members with access to leading experts and up-to date information, enabling them to better represent their clients' interests.

Through its various committees, fora and task forces, the IBA facilitates the exchange of information and views among its members as to laws, practices and professional responsibilities relating to the practice of law around the globe.

IBA Taxes Committee overview

The IBA's widely respected and very active Taxes Committee offers its members access to the highest quality technical, practical and professional tax expertise to assist in understanding and finding solutions to international tax issues and concerns. It also encourages interface between international tax specialists and promotes the building of networks among tax lawyers worldwide to assist them in better serving the interests of their clients. The Committee is informally divided into four practice group areas: Income Taxes, Other Taxes, Tax Litigation and Employee Benefits.

Members are encouraged to contribute content for publication by the Taxes Committee and to present papers at committee conferences and seminars. The Committee also offers tax executives a forum, in its Tax Executives group, to exchange expertise and skills with their colleagues in industry on topics of special interest

Contact information

International Bar Association

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Registration form



8th Annual IBA Finance & Capital Markets Tax Conference

28–29 January 2019, etc.venues St Paul's, London, England

Please read the 'Information' section before completing this form and return it together with your bank transfer or cheque to the Conference Department at the address overleaf.

REGISTER ONLINE AT WWW.IBANET.ORG/CONFERENCES/CONF936.ASPX TO MAKE IMMEDIATE AND SECURE PAYMENT BY CREDIT CARD AND OBTAIN A 10 PER CENT DISCOUNT ON THE FEES BELOW

PERSONAL DETAILS *(Please attach your business card or write in block capitals)*

Title _____ Given name _____ Family name _____

Name and country to be shown on badge *(if different from above)* _____

IBA Membership number *(if applicable)* _____ Date of birth _____

Firm/company/organisation _____

Address _____

Country _____

Tel _____ Fax _____

Email _____

SPECIAL DIETARY REQUIREMENTS

If you have special dietary requirements, due to allergen intolerances, medical, religious reasons or a life choice, please specify the requirement below. The IBA is unable to cater for dietary requirements other than for the above reasons.

Please tick box if you have allergen intolerances and specify _____

Please state all other dietary requirements clearly, i.e. I am a vegetarian; I do not eat red meat.

Disclosure of dietary information denotes you have agreed to the IBA sharing this information with relevant third parties who are providing catering on our behalf.

TO OBTAIN A TEN PER CENT DISCOUNT ON THE FEES BELOW,
PLEASE REGISTER BY **22 JANUARY** ONLINE AT WWW.IBANET.ORG/CONFERENCES/CONF936.ASPX
IBA MEMBERS CAN REGISTER ONLINE BY **21 DECEMBER** FOR **£550**,
PLEASE SEE 'INFORMATION' FOR FURTHER ONLINE REGISTRATION DETAILS.

HARD COPY REGISTRATION FORMS AND FEES RECEIVED:	on or before 21 December	after 21 December	amount payable
IBA member	£610	£710	£
IFA member	£610	£710	£
Non-member*	£760	£860	£
Young lawyers (under 30 years)	£460	£860	£
Academics/judges (full-time)	£460	£860	£
Public lawyers	£460	£860	£
Corporate counsel**	£550	£860	£

SOCIAL FUNCTION

Conference dinner _____ Number of tickets _____ @ £100 _____ £

One dinner place per delegate is permitted.

Social function ticket reservations are subject to availability and cannot be guaranteed unless payment has been received before **23 January**.

TOTAL AMOUNT PAYABLE £



*JOIN THE IBA TODAY AND REGISTER FOR THIS CONFERENCE AT THE IBA MEMBER RATE.
PLEASE FIND THE MEMBERSHIP APPLICATION FORM AT **WWW.IBANET.ORG**.

**A REDUCED RATE IS OFFERED TO IBA CORPORATE GROUP MEMBERS.
PLEASE REGISTER ONLINE TO OBTAIN A 25 PER CENT DISCOUNT ON THE IBA MEMBER FEE

A REDUCED RATE IS OFFERED TO LAWYERS WHO ARE OVER THE AGE OF 65, HAVE BEEN AN IBA MEMBER FOR MORE THAN 20 YEARS AND ARE NO LONGER PRACTISING LAW. PLEASE CONTACT THE IBA OFFICE FOR FURTHER INFORMATION.

FULL PAYMENT MUST BE RECEIVED IN ORDER TO PROCESS YOUR REGISTRATION.
PLEASE NOTE THAT REGISTRATIONS ARE NOT TRANSFERABLE.

METHODS OF PAYMENT

By credit card

Register online at www.ibanet.org/conferences/conf936.aspx and make immediate and secure payment by credit card

Note: please do not send your credit card details on the registration form or within an email or fax.

By bank transfer and cheque/draft

Please send me an invoice.

I enclose a cheque/draft for the total amount payable.

I have transferred to the IBA bank account the total amount payable and have attached a copy of the bank transfer details.

Pounds sterling: by cheque drawn on a UK bank and in favour of the International Bar Association. Please send to: 4th Floor, 10 St Bride Street, London EC4A 4AD, United Kingdom.

OR by bank transfer to the IBA account number: 13270222 (Sort Code 56-00-03) at the National Westminster Bank, St James's & Piccadilly Branch, 208 Piccadilly, London W1A 2DG, United Kingdom or SWIFT address NWBKGB2L, IBAN GB05NWBK56000313270222. **Please ensure that a copy of the bank transfer details is attached to your registration form.**

Euro: by cheque or bank draft, drawn on a euro zone bank and converted at the current rate of exchange and in favour of the International Bar Association.

OR by bank transfer to the IBA bank account number 550/00/06570631 (Sort Code 56-00-03) at the National Westminster Bank, St James's & Piccadilly Branch, 208 Piccadilly, London W1A 2DG, United Kingdom or SWIFT address NWBKGB2L,

IBAN GB58NWBK60721106570631. **Please ensure that a copy of the bank transfer details is attached to your registration form.**

[[Use the exchange rate prevailing at the time of registration.]]

US dollars: by cheque converted at the current rate of exchange and drawn on a US bank and in favour of the International Bar Association. Please send to: 4th Floor, 10 St Bride Street, London EC4A 4AD, United Kingdom.

OR by bank transfer to the IBA account number: 01286498 (Sort Code 56-00-03) at the National Westminster Bank, St James's & Piccadilly Branch, 208 Piccadilly, London W1A 2DG, United Kingdom. SWIFT address NWBKGB2L, IBAN GB55NWBK60730101286498. **Please ensure that a copy of the bank transfer details is attached to your registration form.**

[[Use the exchange rate prevailing at the time of registration.]]

WHERE DID YOU FIRST HEAR ABOUT THIS CONFERENCE?

- | | | | | |
|---|---|---|-----------------------------------|--|
| <input type="checkbox"/> IBA CONFERENCE | <input type="checkbox"/> OTHER CONFERENCE | <input type="checkbox"/> DIRECT MAIL | <input type="checkbox"/> INTERNET | <input type="checkbox"/> ADVERTISEMENT |
| <input type="checkbox"/> EMAIL | <input type="checkbox"/> EDITORIAL | <input type="checkbox"/> RECOMMENDATION | <input type="checkbox"/> OTHER | |

Please provide further details, quoting code (if applicable)

The International Bar Association would like to keep in touch with you about relevant news, events, publications and membership. You can opt out of receiving information at any time by emailing member@int-bar.org or by logging into My IBA and updating your preferences. Your details will be included in the list of participants. If you do not want your details to be included in the list, please email confs@int-bar.org.

For further details on how your data is used and stored: www.ibanet.org/web_privacy_policy.aspx.

PLEASE SEND THE COMPLETED FORM TO INTERNATIONAL BAR ASSOCIATION:

Conference Department

4th Floor, 10 St Bride Street, London EC4A 4AD, United Kingdom

Tel: +44 (0)20 7842 0090 Fax: +44 (0)20 7842 0091 Email: emily.bower@int-bar.org www.ibanet.org

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What membership means for **your firm**

Business development and referral network

The IBA is the biggest referral network in the legal world – there is no better place to expand your business globally



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Obtain business intelligence on topical issues, allowing you to pre-empt their impact and utilise the opportunities they present



Time efficient

The IBA brings you the opportunity to meet 6,000 individuals representing 2,700 international law firms at the IBA Annual Conference



Cost saving

Register for the IBA conferences, which take place worldwide, at discounted IBA member rates



What are the IBA members SAYING?

We first came to the IBA hoping that we would obtain work and referrals, which we have, but we didn't expect to gain relationships with firms which have allowed us to pass out work with peace-of-mind. That connectivity is second to none.

It has really been invaluable.

Paul Marmor, Sherrards Solicitors LLP, London

Membership has allowed us to connect to peers in different jurisdictions, and so better serve our client's needs. Businesses are increasingly international, and so it is vital to have the ability to connect with others and maintain the growth of our firm.

Anne-Helene Le Trocquer, De Gaulle Fleurance & Associés, Paris

First, I would say that I have met wonderful people, and that's the most important thing. You also obtain work. It's not that you look for business – you look for people, for friendships and then the business follows.

Jonas Bergstein,
Bergstein, Montevideo

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US Finance & Tax Counsel

For more than 100 years, Chapman and Cutler has focused on finance. We have spent the past century innovating, working with clients to create new financing products and structures, and shaping the future of finance.

Today, we are one of the largest law firms in the United States focused exclusively on finance. Our tax department provides essential domestic and cross-border advice to support our industry-leading practices in commercial lending, structured finance and securitization, public finance, lease finance, private placement of debt securities, registered investment company funds, and bankruptcy and restructuring.

We understand our clients' goals and needs. We understand their market challenges and risk tolerances. We translate the complexities of US regulations into practical solutions.

Proud Sponsors of the 2019 IBA Finance & Capital Markets Tax Conference

We welcome an opportunity to meet at the conference or connect in the future.



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The law firm Studio Legale Tributario Fantozzi & Associati was established in 1975 by Augusto Fantozzi, a lawyer and full professor of tax law at the "La Sapienza" and "LUISS" Universities in Rome. Professor Fantozzi was the Italian Minister for Finance and the Minister of Foreign Trade between 1995 and 1998, and he is a member of the Board of Directors and the Board of Statutory Auditors of several leading Italian companies and multinational corporations.

The Firm has offices in Rome, Milan and Bologna.

With 8 Senior Partners, all lawyers or chartered accountants, and more than 30 legal professionals, the Firm is highly specialised in tax law, and as such provides clients with advice on Italian and international fiscal law, and assists them in tax litigation.

Thanks to the years of experience of its partners and legal professionals, the Firm can offer clients full support in resolving tax and corporate issues, both nationally and internationally.

Over the years the Firm has dealt with the fiscal aspects of numerous important corporate and financial operations carried out by public and private companies, banks, finance companies and insurance undertakings, and has become their go-to adviser on ordinary and extraordinary tax matters.



MAISTO E ASSOCIATI

Established in 1991 by lawyers with many years of experience in the field, Maisto e Associati is an independent Italian law firm specialised in tax law.

Over the years, the Firm has grown consistently in size and reputation and now has 54 professionals, including 11 partners, with consolidated experience in managing complex, sensitive - domestic and multi-jurisdictional - cases.

The Firm as a whole and several partners individually have been consistently ranked for several years by independent researchers - including Chambers & Partners, The Legal 500, International Tax Review World Tax and World Transfer Pricing - as tier 1 in the Italian tax scene.

Most of the Firm professionals participate in advisory bodies and study groups, are frequent speakers at congresses and contribute to publications and to the most prestigious Italian and foreign tax journals, thus maintaining a cutting-edge knowledge of the most advanced tax issues. Several Firm professionals have substantial experience in international taxation issues, having worked in The Netherlands, France, the USA and the UK.

Most of the work of the Firm has an international dimension. The clientele is represented mainly by national and international financial institutions, venture capital, private equity and real estate players, large corporations and multinationals operating in a variety of industry such as banking, manufacturing, tobacco, media and entertainment, pharmaceutical, real estate, IT, telecommunications and consulting as well as high net worth individuals and international wealthy families.

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