

2019 WORLD CONFERENCE



FINAL PROGRAMME

November 6th – 8th, 2019

The Ritz-Carlton,

Dubai International Financial Centre

Gate Village, DIFC, off - Sheikh Zayed Rd - Dubai - United Arab Emirates

WEDNESDAY, NOVEMBER 6, 2019			
Morning	SPECIAL INTEREST GROUP DAY		
9:00 – 10:15	Athletes and Entertainers A case study about relocation of an entertainer. Taxation of athletes playing in a league.	Chair: Kevin Offer Luis Durá Dean Smith	
10:15 – 11:30	Estate Planning Governance challenges in passing the family business to the next generation. Surprisingly, many wealthy families complain about lack of liquidity.	Chair: Grace Chow Seung-Wan Chae Danielle Wenger	
11:30 – 11:45	BREAK		
11:45 – 13:00	Tax Treaty Issues New special interest group on emerging tax treaty issues. Topics may include limitation of benefits and principal purpose test, permanent establishment and allocation of profits.	Chair: Peter Utterström Paul Kraan Guy Katz	
13:00 – 14:30	LUNCH Note: There will be a working lunch for Managing Partners (those who are tasked with running a firm or a major group within a firm) to discuss practice management issues. Others are welcome to listen to the discussion.		
14:30 – 15:30	Foreign Correspondent Desk Setting up a foreign desk within your firm. What are the challenges and costs / benefits? Experiences from ITSG members who have done this.	Chair: Michael Cadesky John Graham Stanley Ruchelman Sun Yang	
15:30 – 16:00	BREAK		
16:00 – 18:00	Steering Committee Meeting		
19:00 – 22:30	COCKTAIL RECEPTION AND DINNER		

THURSDAY, NOVEMBER 7, 2019		
8:40 – 9:00	Welcome and Introductions	
9:00 – 10:00	Host Country, UAE With no real taxation in U.A.E., discussion will focus on setting up in U.A.E., forms of entities, use as a holding company jurisdiction, requirements to become resident and tax treaties. Practical issues of setting up in U.A.E.	Chair: David Russell David Russell Yann Mrazek
10:00 – 12:00	Special Tax Regimes for Individuals Countries — U.K., Cyprus, Malta, Ireland, Italy, Switzerland, Netherlands, Spain, Portugal, France, Israel, China, U.S. A look at advantageous tax arrangements in selected countries around the world.	Chair: Jane Florides Pablo Alarcón Galia Antebi João Luís Araújo Paul Bramall Michael Fischer Meir Linzen Virginie Marrer Nairy Merheje Gordon Mifsud Andrea Tavecchio Patrick van Rooij Tong Yi
11:00 – 11:20	BREAK	
11:20 - 12:00	Special Tax Regimes for Individuals - continued	
12:00 – 12:40	Need for Substance A look at new substance requirements in the E.U. and other countries.	Chair: John Graham Piergiorgio Valente Graham Wilson Tyson Thompson Peter Golovsky
12:40 – 14:00	LUNCH	
14:00 – 15:20	GAAR A look at forms of GAAR around the world; Canada, U.K., Australia, India and China. A case study on a GAAR analysis.	Chair: Michael Cadesky Jonathan Richler Melanie Hicks Jairaj Purandare Gil Levy Yicheng Shi
15:20 – 15:50	Investment Protection Treaties Worthwhile or worthless, what are they, what do they do?	Paul Kraan
15:50 – 16:10	BREAK	

THURSDAY, NOVEMBER 7, 2019 (cont.)			
16:10 – 17:00	Tax Cases in the E.U. An update on cases in the E.U. at the European Court of Justice including the Apple Case.	Chair: John Chown Martin Phelan John Dewhurst	
17:00 – 17:20	Open Session		
17:20	Group Photo		
19:30 – 22:30	GALA DINNER		
	(Buses depart at 19:00)		



FRIDAY, NOVEMBER 8, 2019			
8:40 – 9:30	European Tax Update The always popular update on European tax developments. This will cover only certain selected countries.	Chair: Michael Fischer Speakers: TBA	
9:30 – 10:20	Digital Economy Discussion of taxation of digital economy, bitcoin, blockchain, taxing the internet and other aspects of this subject.	Chair: Virginie Marrer Chris Jolk Gary Ashford Javier Canosa	
10:20 – 10:50	Investing in Israel's High-Tech Sector What you need to know about taxation in Israel before you invest.	Guy Katz Meir Linzen	
10:50 – 11:10	BREAK		

FRIDAY, NOVEMBER 8, 2019 (cont.)			
11:10 – 11:50	Taxpayer Rights and Morality A look at developments in Taxpayer Rights. Are we going forwards or backwards? Where does morality become relevant to taxation?	Chair: Thomas Lee David Russell Piergiorgio Valente Grace Tan	
11:50 – 12:40	Asia Tax Update Tax update on selected Asian countries.	Seung-Wan Chae Abbas Jaorawala Alexey Karpenko Euney Maria Mata-Perez Ravindran Narayanasamy Sun Yang	
12:40 – 14:00	LUNCH		
14:00 – 14:40	Multi-Lateral Instrument Who's in and more importantly who is out? What are the implications?	Chair: Patrick Vanhaute Omar Morales Petra Eckl	
14:40 – 15:30	U.S. Tax Update What you need to know about the recent U.S. tax reform. How has it changed planning strategies? Perspectives from inside and outside the U.S.	Chair: Stanley Ruchelman Ken Vacovec Dean Smith Rita Ryan	
15:30 – 15:50	Open Session		
15:50 – 16:00	Closing Remarks / Conference Adjourns		
18:00 – 22:30	INFORMAL DINNER (Depart hotel at 18:00)		