



# 2019 WORLD CONFERENCE



## FINAL PROGRAMME

November 6<sup>th</sup> – 8<sup>th</sup>, 2019  
The Ritz-Carlton,  
Dubai International Financial Centre  
Gate Village, DIFC, off - Sheikh Zayed Rd - Dubai - United Arab Emirates

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WEDNESDAY, NOVEMBER 6, 2019

Morning	<b>SPECIAL INTEREST GROUP DAY</b>	
9:00 – 10:15	<b>Athletes and Entertainers</b> A case study about relocation of an entertainer. Taxation of athletes playing in a league.	<b>Chair: Kevin Offer</b> Luis Durá Dean Smith
10:15 – 11:30	<b>Estate Planning</b> Governance challenges in passing the family business to the next generation. Surprisingly, many wealthy families complain about lack of liquidity.	<b>Chair: Grace Chow</b> Seung-Wan Chae Danielle Wenger
11:30 – 11:45	<b>BREAK</b>	
11:45 – 13:00	<b>Tax Treaty Issues</b> 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.	<b>Chair: Peter Utterström</b> Paul Kraan Guy Katz
13:00 – 14:30	<b>LUNCH</b> <i>Note: There will be a <b>working lunch for Managing Partners</b> (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.</i>	
14:30 – 15:30	<b>Foreign Correspondent Desk</b> Setting up a foreign desk within your firm. What are the challenges and costs / benefits? Experiences from ITSG members who have done this.	<b>Chair: Michael Cadesky</b> John Graham Stanley Ruchelman Sun Yang
15:30 – 16:00	<b>BREAK</b>	
16:00 – 18:00	<b>Steering Committee Meeting</b>	
19:00 – 22:30	<b>COCKTAIL RECEPTION AND DINNER</b>	

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THURSDAY, NOVEMBER 7, 2019

8:40 – 9:00	<b>Welcome and Introductions</b>	
9:00 – 10:00	<b>Host Country, UAE</b> 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.	<b>Chair: David Russell</b> David Russell Yann Mrazek
10:00 – 12:00	<b>Special Tax Regimes for Individuals</b> 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.	<b>Chair: Jane Florides</b> 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	<b>BREAK</b>	
11:20 - 12:00	<b>Special Tax Regimes for Individuals - continued</b>	
12:00 – 12:40	<b>Need for Substance</b> A look at new substance requirements in the E.U. and other countries.	<b>Chair: John Graham</b> Piergiorgio Valente Graham Wilson Tyson Thompson Peter Golovsky
12:40 – 14:00	<b>LUNCH</b>	
14:00 – 15:20	<b>GAAR</b> A look at forms of GAAR around the world; Canada, U.K., Australia, India and China. A case study on a GAAR analysis.	<b>Chair: Michael Cadesky</b> Jonathan Richler Melanie Hicks Jairaj Purandare Gil Levy Yicheng Shi
15:20 – 15:50	<b>Investment Protection Treaties</b> Worthwhile or worthless, what are they, what do they do?	Paul Kraan
15:50 – 16:10	<b>BREAK</b>	

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## THURSDAY, NOVEMBER 7, 2019 (cont.)

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



## FRIDAY, NOVEMBER 8, 2019

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

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## FRIDAY, NOVEMBER 8, 2019 (cont.)

11:10 – 11:50	<b>Taxpayer Rights and Morality</b> A look at developments in Taxpayer Rights. Are we going forwards or backwards? Where does morality become relevant to taxation?	<b>Chair: Thomas Lee</b> David Russell Piergiorgio Valente Grace Tan
11:50 – 12:40	<b>Asia Tax Update</b> 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	<b>LUNCH</b>	
14:00 – 14:40	<b>Multi-Lateral Instrument</b> Who's in and more importantly who is out? What are the implications?	<b>Chair: Patrick Vanhaute</b> Omar Morales Petra Eckl
14:40 – 15:30	<b>U.S. Tax Update</b> 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.	<b>Chair: Stanley Ruchelman</b> Ken Vacovec Dean Smith Rita Ryan
15:30 – 15:50	<b>Open Session</b>	
15:50 – 16:00	<b>Closing Remarks / Conference Adjourns</b>	
18:00 – 22:30	<b>INFORMAL DINNER</b> (Depart hotel at 18:00)	