Holding structures in the post BEPS world

Rio de Janeiro, 29 August 2017, 15h00

Program

15h15-16h15

Holding structures in the post BEPS world
Introductory remarks / Chair:
- Prof. Dr. Robert Danon, Professor of International Tax Law, Director of Tax Policy Center and MASIT, University of Lausanne, Partner, Danon & Salomé, Switzerland

Impact of the Multilateral Instrument on holding structures - Focus on Treaty Abuse
- Mr. Jonathan S. Schwarz, Barrister, Temple Tax Chambers, Visiting Professor King’s College London, United Kingdom

Impact of recent EU tax developments on holding structures
- Prof. Dr. Sjoerd Douma, Professor of international and EU Tax Law, University of Leiden, Partner, Lubbers, Boer & Douma, Netherlands

Panel discussants:
- Prof. Dr. Guglielmo Maisto, Professor of Tax Law at Università Cattolica del Sacro Cuore (Piacenza) Founding Partner Maisto e Associati, Italy
- Mr. Bruno Gibert, Partner, CMS Bureau Francis Lefebvre, France
- Mr. Maikel Evers, Advisor - Co-ordinator Multilateral Instrument Tax Treaties, Transfer Pricing & Financial Transactions Division, Centre for Tax Policy Administration, OECD
- Dr. Vikram Chand, Executive Director, Master of Advanced Studies in International Taxation and Executive Program in Transfer Pricing, Tax Policy Center, University of Lausanne, Switzerland

16h15-17h15

Impact of BEPS on source taxation in selected countries – Case study approach
Introductory remarks / Chair: Prof. Dr. Guglielmo Maisto

Panel discussants:
- Mr. Hugues Salomé, Partner, Danon & Salomé, Switzerland
- Mr. Bruno Gibert, France
- Mr. Cesare Silvani, Associate, Maisto e Associati, Italy
- Dr. Vikram Chand, India
- Mr. Victor Matchekhin, Linklaters CIS, Head of Russian Tax Practice, Russia
- Mr. Daniel Armesto, Partner, Garrigues, Spain

17h15 Cocktail reception