



Achieving Tax Certainty in a World of Uncertainty

The EBF 2017 Tax Conference

Wednesday 22 November, EBF Meeting Centre, Brussels

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CONFERENCE PROGRAMME

09.30: Participants registration

10.00 – 10.10

WELCOME ADDRESS

Mr **Wim MIJS**, CEO, European Banking Federation

10.10 – 10.35

OPENING SESSION

LEGAL CERTAINTY IN THE FIELD OF TAXATION: WHY DOES IT MATTER?

Prof **Robert DANON**, Director, Tax Policy Center, University of Lausanne, Partner, Danon & Salomé

10.35 – 12.10

1ST PANEL: BANKS AS TAXPAYERS

FACTORS OF UNCERTAINTY IN THE FIELD OF DIRECT TAXATION AND VAT

Moderators:

- Ms **Petra POSPISILOVA**, Tax Director at CSOB, Chair of the EBF Fiscal Committee;
- Mr **Philippe DELMOTTE**, KBC, Chair of EBF Corporate Income Tax Working Group

Corporate Income Tax: challenges arising from the implementation of the BEPS Action Plan, the Anti-Tax Avoidance Directive and the Multilateral Instrument. Thoughts around recent tax initiatives regarding the digitalization of the economy.

- Ms **Anuschka BAKKER**, Manager Transfer Pricing and Specialist Knowledge Group, International Bureau of Fiscal Documentation
- Mr **David LEDURE**, Partner, PwC
- Mr **Jose Maria VALLEJO CHAMORRO**, Head of Global Tax, BBVA

VAT as a net cost for the banking sector: overall perspective and thoughts around recent CJEU cases.

- Ms **Ine LEJEUNE**, Partner, LawSquare
- Mr **Johan VAN DER PAAL**, Partner, Deloitte

12.10 – 13.30

LUNCH BREAK

13.30 – 15.05

2ND PANEL: BANKS AS TAX INTERMEDIARIES

**FACTORS OF UNCERTAINTY REGARDING CLIENT RELATED
TAX AND REPORTING OBLIGATIONS**

Moderator:

- Mr **Camille SEILLES**, Secretary General, Luxembourg Bankers' Association, Vice-Chair of the EBF Fiscal Committee;

Examples of extraterritorial measures applicable to the financial sector: US Section 871(m) and UK Corporate Criminal Offence

- Mr **Mario LABES**, Association of German Banks, Co-Chair of the EBF Working Group on AEOI
- Mr **David WREN**, Associate Partner, Ernst & Young

Client reporting and due diligence: towards a multiplication of regulatory layers and global approach to beneficial owner information

- Mr **Nenad ILIC**, Directeur, Deloitte Luxembourg
- Mr **Roger KAISER**, Senior Policy Adviser, EBF

Inefficiencies of withholding tax relief/refund procedures applicable to portfolio income

- Ms **Lorraine WHITE**, Managing Director, BNY Mellon, Chair of the EBF TRIES Working Group

15.05 – 15.30

COFFEE BREAK

15.30 – 16.45

3RD PANEL

THE WAY FORWARD

Moderators:

- Ms **Petra POSPISILOVA**, Tax Director at CSOB, Chair of the EBF Fiscal Committee
- Mr **Camille SEILLES**, Secretary General, Luxembourg Bankers' Association, Vice-Chair of the EBF Fiscal Committee

EU Code of conduct on withholding tax relief procedures

- Mr **Thomas NEALE**, Head of Unit, DG Taxud, European Commission

Towards additional tax reporting obligations for Europeans banks? Proposed new transparency rules for tax planning intermediaries

- Mr **Thomas NEALE**, Head of Unit, DG Taxud, European Commission

The role of technology in future tax compliance and reporting

- Mr **Karl KUPPER**, Partner, PwC

16.45 – 17.10

CLOSING REMARKS

The OECD views on how to address tax uncertainty

- Ms **Giorgia MAFFINI**, Head of Unit of the Tax Policy and Statistics Division, OECD