

EBF TAX CONFERENCE 2019

MEET OUR SPEAKERS



10:00 – 10:10 OPENING REMARKS

- **Sébastien de BROUWER, Chief Policy Officer, European Banking Federation**



Sébastien de Brouwer is Chief Policy Officer at the European Banking Federation (EBF). He is a member of the EBF Management Committee. He is supervising all EBF policy areas as well as horizontal functions such as Legal affairs. As part of his activities, Sébastien is also Board member of the European Payment Council (EPC), Member of the Advisory Committee of fTLD Registry Services, LLC and member of various Expert Groups at EU level. He is also member of the editorial Board of the Revue de Droit Bancaire et Financier.

He is a Belgian national with a Law Degree from the Catholic University of Louvain-la-Neuve and a postgraduate in International law (University of Leiden) and in Business Studies (London School of Economics and Political Science). Sébastien joined the EBF in 2006. Before joining the EBF, Sébastien was Head of European Affairs and Member of the Executive Committee with Febelfin, the Belgian Federation of the financial industry (including banks) and previously legal adviser. Prior to that Sébastien also worked in an International bank (Custodian) and an Insurance Company (management of important claims).

- **Roger KAISER, Senior Policy Adviser, European Banking Federation**



Roger Kaiser has 30 years of experience in taxation and financial reporting, mostly in international finance, a solid experience in Anti-Money Laundering (AML) and a robust expertise in international public affairs. In the 90's, he has served the Belgian Internal Revenue Service for 7 years, notably as Head of the Taxation Unit for Brussels' financial intermediaries and as Adviser at the Ruling Commission and the Directorate General for Corporate Income Tax & Withholding Tax.

In 1999, he joined the European Banking Federation (EBF). In addition to his mandate as EBF Internal Auditor, Roger monitors, in his capacity as Senior Policy Adviser, the EBF Fiscal Committee and its 5 Working Groups, the EBF AML Committee and the Financial Crime Strategy Group, and he supervises the EBF Financial Sanctions Expert Group. He currently represents European banks in expert groups, public-private partnerships and coalitions which are dedicated to tax issues and AML and are run under the aegis of European Institutions, international organisations and industry representative bodies including: the Tax Committee of Business Industry at OECD (BIAC), the BIAC Business Advisory Group on the Common Reporting Standard, the Governance Committee of the Europol Financial Intelligence Public Private Partnership, the Global Coalition against Financial Crime, the Financial Crime Working Group of the International Banking Federation (IBFed) and the IBFed Tax Working Group. Roger is the author of books and numerous articles on tax and AML and regularly speaks at conferences and hearings hosted by European Institutions, international organisations and academia in Europe, the US and Asia.

10:10 – 10:30 OPENING SESSION: International tax challenges in a context of globalisation and digitisation

- **John Peterson, Head of Unit - Aggressive Tax Planning, OECD**



John Peterson is responsible for Working Party 11 (WP11) which produced the BEPS Reports on Interest Deductibility, CFCs, Hybrids and Mandatory Disclosure (Actions 2-4, 12). He was part of the joint working group that developed the Mandatory Disclosure Rules for CRS Avoidance Arrangements and is currently responsible for the work on the GloBE proposal (Pillar 2) including the design of the income inclusion and subject to tax rules.

John also provides support to the FTA JITSIC network - a network of tax administrations committed to enhanced information exchange and collaboration to tackle global compliance risks. Prior to joining the OECD, John worked as a tax lawyer in the United Kingdom and the United States and was a partner in an Australasian firm.

10:30 – 12:00 PANEL DEBATE: Update of the international and EU corporate tax rules in the digital age

• **Kris LIEVENS, Partner, KPMG**



Kris joined KPMG in 1995 and is Financial Services tax partner as from 2010. He has more than 20 years' experience in providing international corporate tax services to multinational clients in a wide range of industries and in particular in the financial services sector.

Kris has an in-depth knowledge and extensive experience in the field of taxation of financial products, including investment funds and insurance products.

Kris advises banks, insurance companies and investment companies with respect to corporate income taxes (rulings, tax optimization, tax due diligence, technical provisions, tax reporting), operational taxes (withholding taxes, stock exchange taxes, insurance premium taxes and para-fiscal charges), international tax structuring, reorganizations and automatic exchange of information (FATCA, CRS).

• **Sarah WULFF-COCHRANE, Principal, UK Finance**



Sarah Wulff-Cochrane leads on tax policy for UK Finance. Before the creation of UK Finance, Sarah spent a decade leading the tax policy work of the British Bankers' Association. In both roles Sarah has led the banking and financial services industry response to domestic and international financial and taxation issues.

Prior to the BBA, Sarah spent seven years working in central and local government in the UK, concentrating on strategy, risk and finance. She also holds the professional qualification of a barrister.

• **John Peterson, Head of Unit - Aggressive Tax Planning, OECD**



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• **Bernardus ZUIJDENDORP, Head of Unit, DG Taxud, European Commission**



Bert Zuijndorp heads the 'Company Taxation Initiatives' unit in the European Commission's Taxation and Customs Union Directorate-General. He is in charge of EU directives and policy initiatives in the area of corporate taxation.

Recent initiatives include the 2015 Action Plan on fairer corporation taxation, the 2016 Anti-Tax Avoidance Package and the relaunch of the Common Consolidated Corporate Tax Base, as well as the 2018 proposals in the area of digital taxation. Before joining the Commission, Bert Zuijndorp held various positions in the Dutch Ministry of Finance in both national and international tax policy.

13:15 – 14:45 PANEL DEBATE: The application of VAT on Financial Services back on the EU agenda

• **Laurence LHOTE, Partner, KPMG**



Laurence Lhote is a tax Partner leading the Luxembourg indirect tax team. While Laurence's clients mostly operate in the financial and insurance sectors and include a broad spectrum of financial service providers, such as banks, insurers, asset managers and global custodians, some of her clients are national and multinational businesses active in other sectors, such as international trade and manufacturing. When advising her international clients, Laurence often works as part of a cross-border service team.

Laurence has been involved with various international structuring/restructuring and cost efficiency projects. She also has extensive experience with mergers and acquisitions.

Laurence is a chartered accountant (expert-comptable), Chairwoman of the Indirect Tax Commission at ABBL (Association des Banques et Banquiers, Luxembourg) and an active member of the Indirect Tax Commission at ALFI (Association of the Luxembourg Fund Industry)

• **Pia MICHELSEN, Head of Section, European Commission**



Pia Michelsen has been working for the European Commission since 1995. She is one of three Heads of Sector in the VAT Unit of DG TAXUD. Apart from the VAT Committee, she is in charge of work on financial services and vouchers, VAT grouping and cost-sharing arrangements, domestic and other exemptions, rates and special schemes for SMEs, flat-rate farmers, investment gold and second-hand goods. Prior to taking up her current post, she dealt with place-of-supply issues and was involved in the work resulting in the adoption of the VAT Package.

• **Bradford ROHMER, Senior Analyst, Oxford Research**



Bradford Rohmer leads EU evaluation market for Oxford Research as a Senior Analyst. Since 2008, he has led many public policy evaluations, ex ante impact assessments and other research studies, mostly for the European Commission, but also for other public-sector clients. He has overseen all aspects of such assignments, employing a wide variety of research methods and tools to do so. Before becoming an evaluator, Bradford worked on European policy in the non-profit and public sector and studied political science and economics. Bradford is originally from the United States and speaks French and Swedish in addition to English.

• **Alex MILLER, EBF VAT WG Chair and Senior VAT Manager, Group Tax, Lloyds Banking Group**



Alex started his career in VAT & Indirect Tax in 1993 joining Customs & Excise (HMRC) as an officer. In 1995 he joined Coopers & Lybrand (PwC) to train in Tax and complete his institute exams. Alex Qualified in 1997 and left PwC in 1999 to go into industry. From 1999 – 2006 He worked as VAT Manager for various Telecommunication and Media companies. In 2006 he joined Ernst & Young to work on large system implementation projects supplying VAT advice on the VAT logic. In 2008 he joined HSBC to concentrate on a new career industry – banking; he worked as VAT Senior Manager for Europe (excluding UK). In late 2012 he left HSBC to join the Lloyds Banking Group where he is today.

Alex is a regular contributor to the BBA VAT working Group, and sits as Chair to the European Banking Federation VAT Working group.

15:15 – 16:40 PANEL DEBATE: Transparency of Customers and Investors

- **Lorraine WHITE, Director, BNY Mellon**



Lorraine works for BNY Mellon as Managing Director, Global Head of Securities Tax and Client Solutions where she provides custody tax technical support to BNY Mellon's clients. Key to this is ensuring consistent tax servicing policy and integration of tax risk into the banks wider business agenda.

With an extensive career in Asset Servicing, primarily focusing on custody tax matters, Lorraine is an active participant in global initiatives focusing on simplification and harmonization of tax relief and tax compliance procedures for cross border portfolio investors, including the work of the EU Commission and the OECDs TRACE Group. She is current chair of the EBFs Tax Reporting and Information Exchange Committee and an active member of the Association of Global Custodians Tax Issues Committee, both groups work regularly with tax authorities to eliminate or minimize existing discrepancies in the current tax relief processes and regimes from jurisdiction to jurisdiction.

- **Philip KERFS, Head of Unit, OECD**



Philip Kerfs is a Head of Unit at the Centre for Tax Policy and Administration of the OECD. Over the past years he has mainly worked on a variety of tax transparency projects including the Common Reporting Standard and more recently the Model Mandatory Disclosure Rules for CRS Avoidance Arrangements.

Before joining the OECD, he worked for 13 years as assistant general counsel at Euroclear, where he was responsible for the tax area and the regulatory practice area. Prior to that, he practised tax law at Tournicourt & Vanistendael in Brussels (and enjoyed a spell at the IBFD in Amsterdam). Philip studied law at the Universities of Namur and Leuven (Belgium) and did an LL.M in taxation at the Ecole Supérieure des Sciences Fiscales (Brussels)."

- **Savino RUA, Head of Section, European Commission**



Savino Ruà works for the European Commission, where he is heading the sector for administrative cooperation in direct taxation, within the unit for direct tax policy and cooperation. Over the past three years he has focussed on the implementation, monitoring and evaluation of the Directive for Administrative Cooperation (DAC). Among his tasks, he also promotes the follow up and implementation of the Code of Conduct on Withholding Tax in the EU. Savino joined the Commission in 2011. He studied international relations at the Universities of Turin (Italy) and Tampere (Finland).

- **Marcello TOPA, EMEA Market Policy and Strategy Director, Citi - Markets and Securities Services**



Marcello Topa is responsible for Market Policy and Strategy within Citi's EMEA Securities Services team. He covers Citi's external representation in various European trade associations and regulatory fora in the securities post-trading industry (primarily as Chairman of EBF's "Post Trade Working Group" and as member of AFME's "Post Trade Executive Committee").

Marcello's expertise at Citi spans over 25 years in multiple roles within Direct Custody and Clearing (sales, product management and risk management). He is member of the ECB's "Advisory Group on Market Infrastructures for Securities and Collateral" (AMI-SeCo), member of the T2S "Harmonisation Steering Group" (HSG) and of the Collateral Management Harmonisation Task Force (CMH-TF), and chairman of the T2S "DCP Group" (DCPG). In March 2016 he was appointed by the European Commission as member of the "European Post-Trade Forum" (EPTF) and was among the four co-editors of the EPTF Report on post-trade barriers to efficient capital markets in Europe

- **Paul RADCLIFFE, Partner, EY**



Paul Radcliffe is a tax director in Ernst & Young's EMEIA FSO tax practice. His area of expertise is operational taxes and he specialises in providing tax advice to financial intermediaries.

16:40 – 17:00 CONCLUDING REMARKS

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



Camille Seillès is Secretary General of the Luxembourg Bankers' Association (ABBL). In addition to his management duties within the association, he is in charge of tax dossiers and supervises ABBL business clusters dedicated to private banking and commercial banking. A lawyer by background, Camille holds a Master of Laws (LL.M.) in international business law from King's College London and a Masters' Degree in business taxation from the University of Paris-Dauphine. He received his initial legal training at the University of Cologne and the University of Paris I Panthéon-Sorbonne. He was admitted as avocat à la Cour in Luxembourg in 2008 (on hold since 2012).

Camille is Chair of the Fiscal Committee of the European Banking Federation (EBF) and a member of the Committee on Taxation and Fiscal Policy at the Business and Industry Advisory Group to the OECD (BIAC). He is also involved in the work of the International Banking Federation (IBFed) as regards taxation. Until June 2017, he was a member of the European Commission's Expert Group on automatic exchange of financial account information. In Luxembourg, Camille is on the panel of tax experts advising the Economic and Social Council and the Luxembourg Federation of Employers (UEL).