

Master of Advanced Studies in International Taxation (MASIT)

www.hec.unil.ch/masit
2018 applications are open

Invitational Seminar

Description

Holding structures have always been an essential part of business models of MNE Groups. This invitational seminar, composed of a panel of leading international tax experts, will explore the impact of the BEPS initiative, in particular the Multilateral Instrument (MLI) and recent EU tax developments on holding structures. Next, relying on a case study approach, the panel will look at how these developments will in the future affect source taxation in selected jurisdictions from which holding companies may derive income.

Venue

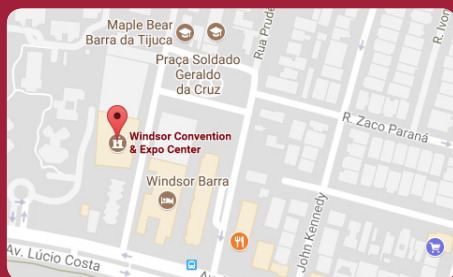
Windsor Convention & Expo Center

(Conference room "Galapagos I & II")

R. Martinho de Mesquita
129 - Bloco 2, Barra da Tijuca
Rio de Janeiro - RJ, 22620-220

Brasil

To reserve your (free) seat please mail to:
natacha.fauconnier@unil.ch
Limited seats available.



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**