

A conference presented by the IBA Taxation Section
and supported by the IBA European Regional Forum



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the legal profession®

5th Annual IBA Tax Conference

Current International Tax Issues in Cross-Border Corporate Finance and Capital Markets

8–9 February 2016, etc. Venues Monument, London, England

Topics include:

- BEPS update and recent developments
- UK diverted profits tax
- Interest and financing costs
- Synthetic investment schemes
- Common reporting
- Transfer pricing under attack – state aid
- Project finance, securitisations and repackaging
- Current issues for financial institutions
- Current issues affecting funds
- How is cross-border M&A affected?
- Best practices on anticipating or avoiding tax adjustments

Headline conference sponsor

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UP TO 13.5 CPD/CLE
HOURS AVAILABLE*

Programme

Conference Chair

Jack Bernstein *Aird & Berlis, Toronto*

Monday 8 February

0830 – 1715 **Registration**

0930 – 1100

BEPS update and recent developments

- BEPS update
 - Interest deductibility
 - Hybrids
 - Treaty shopping
 - Anti-avoidance
 - Beneficial interest
 - Intangibles
 - Digital economy
 - Automatic and group request exchange of information
 - Mandatory arbitration
- EU responses to BEPS (individual countries and EU Commission)
- US model Income Tax Treaty
- Response to BEPS in South America
- Permanent establishment

Session Chair

Edward R Osterberg Jr *Mayer Brown, Houston*

Speakers

Kim Blanchard *Weil Gotshal & Manges, New York*

Steven Edge *Slaughter & May, London*

Raquel Novais *Machado Meyer Sendacz e Opice, São Paulo*

Klaus Sieker *Flick Gocke Schaumburg, Frankfurt am Main*

Ewout van Asbeck *Van Doorne, Amsterdam; Co-Chair, IBA Taxes Committee*

1100 – 1115 **Coffee/tea break**

1115 – 1200

UK diverted profits tax

- Charges which may apply
- Exceptions to charging provisions
- Calculation mechanics and interaction with transfer pricing
- EU law and tax treaty issues
- BEPS interaction
- Practical examples

Session Chair

Sandy Bhogal *Mayer Brown, London*

Speakers

Andrew Loan *Macfarlanes, London; Vice Chair, IBA Taxes Committee*

Simon Yates *Travers Smith, London; International Organisations Liaison Officer, IBA Taxes Committee*

1200 – 1300 **Lunch**

1300 – 1415

Interest and financing costs

- Interest deductibility
- Thin capitalisation
- Re-characterisation
- Back-to-back loans
- Guarantors and co-obligators
- Keep well agreements and pledges of stock
- Debt modifications
- Debt push down structures
- Double dip financing
- Repos and other hybrid financing
- Imputed interest (notional interest deduction regimes in various countries)

Session Chair

Gordon Warnke *Linklaters, New York; Membership Officer North America, IBA Taxes Committee*

Speakers

James Barry *Mayer Brown, Chicago*

Pascal Hinny *Lenz & Staehelin, Zurich*

Margriet Lukkien *Loyens & Loeff, Amsterdam; Scholarship Officer, IBA Taxes Committee*

Pano Pliotis *GE Capital, London*

Barbara Worndl *Aird & Berlis, Toronto*

Headline social event sponsor



Conference luncheon sponsor



Monday continued

1415 – 1530

Synthetic investment schemes

- Derivatives
- Securities lending
- Participating loans
- Prime brokerage

Session Chair

Albert Collado *J&A Garrigues, Barcelona*

Speakers

Paul Carman *Chapman & Cutler, Chicago; Secretary, IBA Taxes Committee*

Paul Hale *Alternative Investment Management Association, London*

Scott Newman *K&L Gates, New York*

Olivier Rémacle *Atoz Tax Advisers, Luxembourg*

1530 – 1545 **Coffee/tea break**

1545 – 1715

Future of treaty formed holding companies and preferred tax regimes and unwinding existing structures adversely impacted by BEPS or EU parent directive

- Holding companies: Benelux, Ireland, Spain, Malta, UK, Switzerland
- Double dip financing
- Hybrid entities
- Debt push down structures
- Hybrid debt
- Patent box
- Risk of state aid
- Implications of 'Brexit'

Session Chair

Werner Heyvaert *Jones Day, Brussels*

Speakers

Michel Collet *CMS Bureau Francis Lefebvre, Neuilly sur Seine*

Ailish Finnerty *Arthur Cox, Dublin*

Sam Kaywood *Alston & Bird, Atlanta; Conferences Coordinator, IBA Taxes Committee*

Peter Reinartz *Bär & Karrer, Zurich*

David Saleh *Clifford Chance, London*

Frank R Tschesche *GvW Graf von Westphalen, Frankfurt*

Ayzo van Eysinga *Stibbe, Luxembourg*

1715 – 1815 **Drinks reception**

Capital Suite foyer, etc. Venues Monument

1830 **Conference dinner**

Banking Hall, 14 Cornhill, London EC3V 3ND

Ticket price: £85.

Entry is by ticket only. No transport will be provided.

Originally designed in the 1930's, enjoy the grandeur of this Grade II listed former bank as you dine in the heart of the Square Mile.

Tuesday 9 February

0830 – 1730 **Registration**

0900 – 0945

Common reporting

- Differences between FATCA, common reporting standard and automatic exchange of information
- Standards for harmonising reporting
- Managing foreign currency – functional currency elections

Session Chair

Stuart Chessman *Vivendi, New York*

Speakers

Andrew Solomon *Sullivan & Cromwell, New York*

Silvia Zimmermann *Pestalozzi Attorneys at Law, Zurich*

0945 – 1030

Transfer pricing under attack – state aid

- The arm's length standard revisited post-BEPS
- Country-by-country reporting
- Transfer pricing dispute resolution
- State aid challenges
- Chevron case
- Risk, recharacterisation and capital

Session Chair

Murray Clayton *Freshfields Bruckhaus Deringer, London*

Speakers

Henry Birnkrant *Alston & Bird, Washington DC*

Chris Kinsella *Minter Ellison, Sydney*

Maura Parsons *HM Revenue & Customs, London*

1030 – 1045 **Coffee/tea break**

1045 – 1200

Current issues for financial institutions

- Tax impact of bank regulatory developments
 - Tax consequences of living wills, bail-in debt, etc.
 - Deductibility implications of Basel III regulatory capital requirements
 - Impact of EU and other bank regulatory developments
 - Collateral damage? Potential impact on banks of broader global initiatives (BEPS-driven or otherwise)
- Important tax rulings and guidance affecting banks
 - Swiss Federal Supreme Court decision on dividend stripping
 - New US regulations on dividend equivalents
 - Compare/contrast with related developments in Italy, Germany and the UK
 - Breaking news

Session Chair

Robert Culbertson *Covington & Burling, Washington DC*



Exhibitor

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Tuesday continued

Speakers

Patrizio Braccioni *Paul Hastings, Milan*

Sean Finn *Latham & Watkins, London*

Michael Marquardt *Gleiss Lutz, Frankfurt am Main*

Michael Nordin *Schellenberg Wittmer, Zurich*

1200 – 1245 **Lunch**

1245 – 1400

Current issues affecting funds

- Private equity, distressed debt, hedge, royalty, real estate and sovereign
- Fund formation and fund transactions
- BEPS LOB clauses
- Treaty shopping
- Financing
- Use of blocker partnerships
- Derivatives, swaps, short sales

Session Chair

Rom Watson *Ropes & Gray, Boston*

Speakers

Brenda Coleman *Ropes & Gray, London*

Peter Flipsen *Simmons & Simmons, Amsterdam*

Stuart Leblang *Akin Gump, New York*

Jeffrey Trinklein *Gibson Dunn & Crutcher, New York*

1400 – 1445

How is cross-border M&A affected?

- Residency for LOB clauses
- Use of hybrids as acquisition vehicle
- Financing
- Inversions
- Cross-border mergers
- Use of holding companies

Session Chair

Michael Lebovitz *White & Case, Los Angeles*

Speakers

Lodewijk Berger *Jones Day, Amsterdam*

Jonathan Cooklin *Davis Polk & Wardwell, London*

Riccardo Michelutti *Maisto & Associati, Milan*

1445 – 1500 **Coffee/tea break**

1500 – 1600

Project finance, securitisations and repackaging

- Recent developments in securitisation transactions
- BEPS Action 6 challenges for securitisation transactions
- Risk retention requirements in the EU and the US and their interaction with the hybrid mismatch proposals for related parties
- Project bonds and financing structures for foreign investors

Session Chair

Peter Maher *A&L Goodbody, Dublin*

Speakers

Paul Miller *Ashurst, London*

Raul-Angelo Papotti *Chiomenti Studio Legale, Milan; Membership Officer, IBA Individual Tax and Private Client Committee*

Andrew R Walker *Milbank Tweed Hadley & McCloy, New York*

1600 – 1730

Best practices on anticipating or avoiding tax adjustments and current issues for cross border corporate finance and capital markets

- Retroactivity of legislation
- Application of old treaties in light of BEPS, EU directives and changing domestic legislation
- Automatic and group requests exchange of information
- Non-binding guidance by tax authorities
- Future of tax rulings – transparency
- Reporting of tax savings schemes
- Communicating a company's tax position to the public (eg, HSBC or Aldi in Australia)
- Legal privilege and confidentiality
- Allocation of penalties and fines to permanent establishments
- Tax secrecy: what does it mean in different countries?
- State aid consequences – are European incentives state aid?
- Recent finance tax avoidance cases

Session Chair

Wilhelm Haarmann *Linklaters, Frankfurt am Main*

Speakers

Francesco Capitta *Macchi di Cellere Gangemi, Rome; Treasurer, IBA Taxes Committee*

Carlos Ferrer *Cuatrecasas Goncalves Pereira, Madrid*

Alain Ranger *Fasken Martineau DuMoulin, Montreal; Senior Vice-Chair, IBA Taxes Committee*

Clemens Philipp Schindler *Schindler Rechtsanwälte, Vienna*

Jonathan Schwarz *Temple Tax Chambers, London*

Jason Yen *US Department of the Treasury, Washington DC*

Continuing Professional Development/Continuing Legal Education

*The number of CPD/CLE hours available may vary depending on the rules applied by the members' bar association/law society on time recording criteria.

For conference delegates from jurisdictions where CPD/CLE is mandatory, the IBA will provide a Certificate of Attendance for the conference. Subject to CPD/CLE requirements, this can be used by conference delegates to obtain the relevant number of hours' accreditation.

A CPD/CLE Certificate of Attendance is available to conference delegates on request. Please ask at the IBA conference registration desk for information on how to obtain the certificate.

Information

Date

8–9 February 2016

Venue

etc.Venues Monument
8 Eastcheap
London
EC3M 1AE
Tel: +44 (0)20 7014 3400

Fees

Online registrations received:

	on or before 8 January	until 3 February
IBA member	£475	£565
Non-member*	£610	£700
Young lawyers (under 30 years)	£360	£700
Academics/judges (full-time)	£360	£700
Public lawyers	£360	£700
Corporate counsel	£430	£700
Guest	£25	£25
Conference dinner	£85	£85

After **3 February** registrations must be received in hard copy at the IBA office.

Hard copy registration forms and fees received:

	on or before 8 January	after 8 January
IBA member	£530	£630
Non-member*	£680	£780
Young lawyers (under 30 years)	£400	£780
Academics/judges (full-time)	£400	£780
Public lawyers	£400	£780
Corporate counsel	£475	£780
Guest	£25	£25
Conference dinner	£85	£85

* By paying the non-member fee, we welcome you as a delegate member of the IBA for the year in which this conference is held, which entitles you to the following benefits:

- 1) Password access to certain parts of the IBA website.
- 2) Receipt of *IBA E-news* and access to online versions of *IBA Global Insight*.
- 3) Pay the member rate for any subsequent conference registrations for this calendar year.

If you would like to become a full or general member of the IBA, which includes membership of one committee or more – and inclusion in and access to our membership directory – we encourage you to do so now in order to register for this conference at the member rate. Full details of how to join can be found at www.ibanet.org.

A reduced rate is offered to lawyers who are over the age of 65, have been an IBA member for more than 20 years and are no longer practising law.

Full payment must be received in order to process your registration.

Fees include:

- Attendance at all working sessions
- Conference materials, including any available speakers' papers submitted to the IBA before 29 January.

Language

All working sessions and conference materials will be in English.

How to register

Register online by **3 February** at www.ibanet.org/conferences/conf689.aspx and make payment by credit card, to avail of the ten per cent online registration discount or complete the attached registration form and return it to Judith Hawkes at the IBA together with your payment. You should receive emailed confirmation of your registration within five days; if you do not then please contact Judith Hawkes at judith.hawkes@int-bar.org.

- Access to the above conference working materials from the IBA website (www.ibanet.org) approximately seven days prior to the conference
- Access to mobile delegate search application
- Lunch on Monday and Tuesday
- Tea and coffee during breaks
- Drinks reception on Monday
- VAT at 20 per cent

Please note that registrations are not transferable.

Guest fees include:

- Drinks reception on Monday
- VAT at 20 per cent

A guest must not be a member of the legal profession or seek to use the Conference as a business networking opportunity. Access to working sessions is not permitted for guests. Checks are made to ensure members of the legal profession are not registered as guests, if this is the case, registration will be refused unless the guest registers as a full delegate for the conference. Only registered guests (ie, those paying the guest fee) are eligible to participate in the social programme.

List of participants

In order for your name to appear in the list of participants, which will be distributed at the conference, your registration form must be received by **3 February** at the latest.

Mobile delegate search application

All registered delegates will receive a printed list of participants at the conference, however delegates are now also able to use the mobile delegate search. This application has been developed to aid networking by giving delegates instant access to an up-to-date list of their fellow attendees, and comes with the added benefit of a built-in messaging service. All registered delegates with an internet or Wi-Fi-enabled device will have access, using their IBA username and password. Simply visit: m.ibanet.org/conf689

Registration confirmation

All documentation regarding your attendance at the conference can now be obtained from the IBA website. Upon receipt of your payment for the conference a confirmation email will be sent containing instructions on how to download the documents. Registration confirmation will not be distributed by post.

Photography and filming

Certain sessions and/or social functions may be photographed and/or filmed and some of this content may be used for future IBA marketing materials, member communications, products or services. Should you have any concerns with regard to this, or do not wish to be featured in any of these materials please contact the IBA Marketing Department at ibamarketing@int-bar.org.

Promotional literature

Please note that no individual or organisation may display or distribute publicity material or other printed matter during the conference, unless by prior arrangement with the IBA. Organisations and companies wishing to discuss promotional opportunities should contact the Sponsorship Department at the IBA (sponsorship@int-bar.org).

Travel arrangements and visas

Participants are responsible for making their own travel arrangements. It is recommended that you check your visa requirements with your local embassy or consulate. **We are unable to dispatch visa invitation letters to support your visa application prior to receipt of your registration form and full payment of registration fees.**

Please apply for your visa in good time.



Payment of registration fees

Pounds sterling: by cheque drawn on a UK bank and in favour of the International Bar Association. Please send to: 4th Floor, 10 St Bride Street, London EC4A 4AD, United Kingdom.

OR by bank transfer to the IBA account number: 13270222 (Sort Code 56-00-03) at the National Westminster Bank, St James's & Piccadilly Branch, 208 Piccadilly, London W1A 2DG, United Kingdom or SWIFT address NWBKGB2L, IBAN GB05NWBK56000313270222. **Please ensure that a copy of the bank transfer details is attached to your registration form.**

Euro: by cheque or bank draft, drawn on a euro zone bank and converted at the current rate of exchange and in favour of the International Bar Association.

OR by bank transfer to the IBA bank account number 550/00/06570631 (Sort Code 56-00-03) at the National Westminster Bank, St James's & Piccadilly Branch, 208 Piccadilly, London W1A 2DG, United Kingdom or SWIFT address NWBKGB2L, IBAN GB58NWBK60721106570631. **Please ensure that a copy of the bank transfer details is attached to your registration form.**

Use the exchange rate prevailing at the time of registration.

US dollars: by cheque converted at the current rate of exchange and drawn on a US bank and in favour of the International Bar Association. Please send to: 4th Floor, 10 St Bride Street, London EC4A 4AD, United Kingdom.

OR by bank transfer to the IBA account number: 01286498 (Sort Code 56-00-03) at the National Westminster Bank, St James's & Piccadilly Branch, 208 Piccadilly, London W1A 2DG, United Kingdom. SWIFT address NWBKGB2L, IBAN GB55NWBK60730101286498. **Please ensure that a copy of the bank transfer details is attached to your registration form.**

Use the exchange rate prevailing at the time of registration.

Credit card payments: by Visa, MasterCard or American Express.
No other cards are accepted.

PLEASE ENSURE THAT YOUR NAME AND 'CON689LONDON' APPEAR ON ANY TRANSFER OR DRAFT.

Hotel Accommodation

Below is a list of hotels located near etc. Venues Monument. Please contact the hotel of your choice directly to find out rates, availability and to make your reservation.

Grange City Hotel

8-14 Copper's Row, London EC3N 2BQ
Tel: +44 (0) 7863 3700

www.grangehotels.com/hotels-london/grange-city

Shangri-La Hotel at The Shard

31 St Thomas Street, London SE19QU
Tel: +44 20 7234 8000

www.shangri-la.com/london/shangrila/

Apex City of London Hotel

1 Seething Lane, London EC3N 4AX
Tel: +44 (0) 131 441 0440

www.apexhotels.co.uk/en/hotels/london/apex-city-of-london-hotel/

Club Quarters Gracechurch Street

7 Gracechurch Street, London EC3V 0DR
Tel: +44 (0) 20 7666 1620

www.clubquartershotels.com/london/gracechurch

Disabled access

The conference venue is wheelchair accessible. Please notify us if you require special assistance.

No deductions or withholdings

All fees payable to us by you in accordance with the terms contained in this 'Information' section shall be paid free and clear of all deductions or withholdings whatsoever.

If any deductions or withholdings are required by law to be made from any fees payable to us by you under the terms contained in this 'Information' section you shall pay such sum as will, after the deduction or withholding has been made, leave us with the same amount as we would have been entitled to receive in the absence of any such requirement to make a deduction or withholding.

If we obtain the benefit of any tax credit or other relief by reference to any such deductions or withholdings, then we shall repay to you such amount as, after such repayment has been made, will leave us in no worse position than we would have been had no such deductions or withholdings been required.

Conference sell-outs

The IBA places its conference in venues of a suitable size for the event; however there are times when our conferences may sell out. Should this happen, prospective delegates will be informed and a waiting list will operate. The waiting list will function on a 'first come, first served' basis, subject to receiving registered delegate cancellations. The IBA will not be liable for any travel or accommodation expenses incurred by an individual who travels to the conference without a confirmed place at the event.

Cancellation of registration

If cancellation is received in writing at the IBA office by **8 January**, fees will be refunded less a 25 per cent administration charge. We regret that no refunds can be made after this date. Registrations received after **8 January** will not be eligible for any refund of registration fees.

Provided you have cancelled your registration to attend an IBA conference in accordance with the terms of the 'cancellation of registration' clause included in the 'Information' section of the relevant conference programme, you must then confirm to us in writing at the IBA office as soon as possible but in no event later than one year (12 calendar months) from the date of any such conference all necessary details to enable any reimbursement owed to you to be paid. We regret that no refunds will be made after the date that is one year (12 calendar months) after the date of the relevant conference.

Social programme

Monday 8 February

1715 Drinks reception

Capital Suite foyer, etc. Venues Monument

Monday 8 February

1830 Conference dinner

Banking Hall, 14 Cornhill, London EC3V 3ND

Ticket price: £85.

Entry is by ticket only. No transport will be provided.

Originally designed in the 1930's, enjoy the grandeur of this Grade II listed former bank as you dine in the heart of the Square Mile.

Social event ticket reservations cannot be guaranteed unless payment has been received before **2 February**, subject to availability.

The organisers may at any time, with or without giving notice, in their absolute discretion and without giving any reason, cancel or postpone the conference, change its venue or any of the other published particulars, or withdraw any invitation to attend. In any case, neither the organisers nor any of their officers, employees, agents, members or representatives shall be liable for any loss, liability, damage or expense suffered or incurred by any person, nor will they return any money paid to them in connection with the conference unless they are satisfied not only that the money in question remains under their control but also that the person who paid it has been unfairly prejudiced (as to which, decision shall be in their sole and unfettered discretion and, when announced, final and conclusive).

Registration form



5th Annual IBA Tax Conference

Current International Tax Issues in Cross-Border Corporate Finance and Capital Markets

8–9 February 2016, etc. Venues Monument, London, England

Please read the 'Information' section before completing this form and return it together with your payment to Judith Hawkes at the address overleaf.

Personal details *(Please attach your business card or write in block capitals)*

Title _____ Given name _____ Family name _____

Name and country to be shown on badge *(if different from above)* _____

IBA membership number *(if applicable)* _____ Date of birth _____

Firm/company/organisation _____

Address _____

Tel _____ Fax _____

Email _____

Guest _____

Guests are not entitled to attend the working sessions. No member of the legal profession may be registered as a guest.

Special dietary requirements _____

TO OBTAIN A TEN PER CENT DISCOUNT ON THE FEES BELOW,
PLEASE REGISTER BY **3 FEBRUARY** ONLINE AT **WWW.IBANET.ORG/CONFERENCES/CONF689.ASPX**
IBA MEMBERS CAN REGISTER ONLINE BY **8 JANUARY** FOR **£475**
PLEASE SEE 'INFORMATION' FOR FURTHER ONLINE REGISTRATION DETAILS.

Hard copy registration forms and fees received:	on or before 8 January	after 8 January	amount payable
IBA member	£530	£630	£
Non-member*	£680	£780	£
Young lawyers (under 30 years)	£400	£780	£
Academics/judges (full-time)	£400	£780	£
Public lawyers	£400	£780	£
Corporate counsel	£475	£780	£
Guest	£25	£25	£

Guests are not entitled to attend the working sessions. No member of the legal profession may be registered as a guest.

Social function

Conference dinner Number of tickets _____ @ £85 £

One dinner ticket for each delegate is permitted.

Social function ticket reservations are subject to availability and cannot be guaranteed unless payment has been received before **2 February**.

TOTAL AMOUNT PAYABLE £

A REDUCED RATE IS OFFERED TO LAWYERS WHO ARE OVER THE AGE OF 65, HAVE BEEN AN IBA MEMBER FOR MORE THAN 20 YEARS AND ARE NO LONGER PRACTISING LAW. PLEASE CONTACT THE IBA OFFICE FOR FURTHER INFORMATION.
*JOIN THE IBA TODAY AND REGISTER FOR THIS CONFERENCE AT THE IBA MEMBER RATE.
PLEASE FIND THE MEMBERSHIP APPLICATION FORM AT **WWW.IBANET.ORG**.

FULL PAYMENT MUST BE RECEIVED IN ORDER TO PROCESS YOUR REGISTRATION.
PLEASE NOTE THAT REGISTRATIONS ARE NOT TRANSFERABLE.



Payment details

- I enclose a cheque/bank draft made payable to the IBA for the total amount payable.
- I have transferred to the IBA bank account the total amount payable and have attached a copy of the bank transfer details.
- Please charge the total amount due to my (delete as appropriate) Visa/MasterCard/American Express. *Other cards are not accepted.*

Card number _____ Start date _____ Expiry date _____

Name of cardholder _____

Signature _____ Date _____

Where did you first hear about this conference?

- IBA CONFERENCE OTHER CONFERENCE DIRECT MAIL INTERNET ADVERTISEMENT
- EMAIL EDITORIAL RECOMMENDATION OTHER

Please provide further details, quoting code (if applicable)

IBA listings are provided to relevant third parties for marketing purposes. The IBA will treat your personal information with the utmost respect and in accordance with UK data privacy laws.

If you are agreeable to passing on your details, please tick this box

If you do **not** wish to receive IBA information and materials, please tick this box

Your details will however be included in the list of participants.

Please send the completed form to:

International Bar Association

Judith Hawkes

4th Floor, 10 St Bride Street, London EC4A 4AD, United Kingdom

Tel: +44 (0)20 7842 0090 Fax: +44 (0)20 7842 0091

Email: judith.hawkes@int-bar.org www.ibanet.org

For office use only Payment _____ Banked _____ Processed _____



IBA 2016 18–23 SEPTEMBER WASHINGTON DC

The 2016 IBA Annual Conference will be held in Washington DC, home to the federal government of the USA and the three branches of US government – Congress, the President and the Supreme Court. Washington DC is also an important centre for international organisations and is home to the International Monetary Fund and the World Bank. As well as being the political centre of the USA, Washington DC is home to some spectacular museums and iconic monuments clustered around the National Mall.

Washington DC will give the 2016 IBA Annual Conference the perfect blend of opportunities for business, cultural exploration and to develop a unique set of new contacts. This mix makes Washington DC an ideal location for the world's leading conference for international lawyers.

WHAT WILL WASHINGTON DC 2016 OFFER YOU?

- Access to the world's best networking and business development event for lawyers – with over **6,000** lawyers and legal professionals attending from around the world
- Up-to-date knowledge of the key developments in your area of the law – with nearly **200** working sessions covering all areas of practice
- The opportunity to generate new business with the leading firms from around the globe
- Up to **25** hours of continuing legal education and continuing professional development
- A variety of social functions providing ample opportunity to network and see the city's famous sights



TO REGISTER YOUR INTEREST:

Visit: www.ibanet.org/Conferences/Washington2016.aspx

Email: ibamarketing@int-bar.org

OFFICIAL CORPORATE SUPPORTER



The International Bar Association's Human Rights Institute



the global voice of
the legal profession®

The International Bar Association's Human Rights Institute (IBAHRI), established in 1995, works to promote and protect human rights and the independence of the legal profession worldwide. The IBAHRI undertakes training for lawyers and judges, capacity-building programmes with bar associations and law societies, and conducts high-level fact-finding missions and trial observations. The IBAHRI liaises closely with international and regional human rights organisations, producing news releases and publications to highlight issues of concern to worldwide media.



All IBAHRI activities are funded by grants and individual donations.

To help support our projects, become a member for just £40 a year – less than £4 a month.

Visit www.ibanet.org/IBAHRI.aspx for more information, and click join to become a member. Alternatively, email us at hri@int-bar.org.

To read more on IBAHRI activities, download the IBAHRI Annual Report 2014 at <http://tinyurl.com/IBAHRI-AnnualReport2014>.



Our work around the world

■ Work carried out in 2014 ■ Work carried out prior to 2014



www.ibanet.org/IBAHRI.aspx



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International Bar Association Conferences 2015–2016



4 NOVEMBER 2015 JAKARTA, INDONESIA

Asia Pacific Arbitration Group Training Day – Best Practices in International Arbitration

12 NOVEMBER 2015 MOSCOW, RUSSIA

7th Annual Mergers and Acquisitions in Russia and CIS Conference

12 NOVEMBER 2015 LONDON, ENGLAND

Private Equity Transactions Symposium

12–13 NOVEMBER 2015 SÃO PAULO, BRAZIL

Celebrating Magna Carta and the Rule of Law

14–15 NOVEMBER 2015 LONDON, ENGLAND

IBA-ELSA Law Students' Conference 2015

18–20 NOVEMBER 2015

LIVINGSTONE, ZAMBIA

Building on the Foundations for a Successful Future: Economic Development and the Rule of Law in Africa

18–20 NOVEMBER 2015 LONDON, ENGLAND

7th Biennial Global Immigration Conference

19–20 NOVEMBER 2015

SEOUL, SOUTH KOREA

Mergers & Acquisitions in the Technology Sector: Current Asian and International Trends

3 DECEMBER 2015 LONDON, ENGLAND

Third Party Funding and International Arbitration: a 360 degree perspective

3–4 DECEMBER 2015 MEXICO CITY, MEXICO

The New Era of Taxation: The keys to providing legal advice on tax law in a rapidly changing world

4 DECEMBER 2015 MOSCOW, RUSSIA

9th Annual Law Firm Management Conference

4 DECEMBER 2015 PARIS, FRANCE

The Rise of Ethics and Transparency in Mediation and ADR: Fighting Corruption and Abuses Through New Means

5 DECEMBER 2015 NEW DELHI, INDIA

Magna Carta 800th Anniversary – Foundation of Democracy and the New Trends of Dispute Resolution in India

27–29 JANUARY 2016 MEXICO CITY, MEXICO

Mexico's Energy Reform: The Bidding Has Begun

30–31 JANUARY 2016

THE PEACE PALACE, THE HAGUE

Legal Challenges of Modern Warfare

3–5 FEBRUARY 2016 TOKYO, JAPAN

IBA/ABA International Cartel Workshop

8–9 FEBRUARY 2016 LONDON, ENGLAND

5th Annual IBA Taxation Conference

11–12 FEBRUARY 2016 PARIS, FRANCE

4th IBA European Corporate and Private M&A Conference

17–19 FEBRUARY 2016

ADELAIDE, AUSTRALIA

Innovation in Legal Practice

29 FEBRUARY – 1 MARCH 2016

LONDON, ENGLAND

21st Annual International Wealth Transfer Practice Law Conference

3 MARCH 2016 SHANGHAI, CHINA

Asia Pacific Arbitration Group Meeting

3 MARCH 2016 SHANGHAI, CHINA

Young Practitioners' Symposium

4 MARCH 2016 SHANGHAI, CHINA

19th Annual International Arbitration Day

6–8 MARCH 2016 LONDON, ENGLAND

17th Annual International Conference on Private Investment Funds

9–11 MARCH 2016 RIO DE JANEIRO, BRAZIL

Biennial Latin American Regional Forum Conference

10–11 MARCH 2016 SINGAPORE

2nd Asia-based International Financial Law Conference

18–19 MARCH 2016 MUMBAI, INDIA

The Changing Landscape of M&A in India

7–8 APRIL 2016 BERLIN, GERMANY

7th World Women Lawyers' Conference

14–15 APRIL 2016 COPENHAGEN, DENMARK

8th Annual Real Estate Investment Conference

14–15 APRIL 2016 MEXICO CITY, MEXICO

IBA Annual Employment and Discrimination Law Conference

17–20 APRIL 2016 NEW YORK, USA

Biennial Conference of the Section on Energy, Environment, Natural Resources and Infrastructure Law

21–22 APRIL 2016

JOHANNESBURG, SOUTH AFRICA

Africa – Opportunities and Challenges in doing M&A Transactions

27–29 APRIL 2016 SAN FRANCISCO, USA

IBA Annual Litigation Forum 2016

MAY 2016 DUBAI, UAE

Dispute Resolution in the Arab Region



International Bar Association

the global voice of the legal profession

The **International Bar Association** (IBA), established in 1947, is the world's leading organisation of international legal practitioners, bar associations and law societies. The IBA influences the development of international law reform and shapes the future of the legal profession throughout the world. It has a membership of more than 50,000 individual legal professionals and 205 bar associations and law societies spanning all continents and has considerable expertise in providing assistance to the global legal community.

Grouped into two divisions – the **Legal Practice Division** and the **Public and Professional Interest Division** – the IBA covers all practice areas and professional interests, providing members with access to leading experts and up-to-date information. Through the various committees of the divisions, the IBA enables an interchange of information and views among its members as to laws, practices and professional responsibilities relating to the practice of law around the globe. Additionally, the IBA's world-class conferences provide unrivalled professional development and network-building opportunities for international legal practitioners, senior business professionals, regulators and government officials.

Taxes Committee overview

The IBA's widely respected and very active Taxes Committee offers its members access to the highest quality technical, practical and professional tax expertise to assist in understanding and finding solutions to international tax issues and concerns. It also encourages interface between international tax specialists and promotes the building of networks among tax lawyers worldwide to assist them in better serving the interests of their clients. The committee is divided informally into four practice group areas: Income Taxes, Other Taxes, Tax Litigation and Employee Benefits. Members are encouraged to contribute to the committee newsletter which is published two to three times per year and to present papers at committee conferences and seminars. The committee also offers tax executives a forum, in its Tax Executives group, to exchange expertise and skills with their colleagues in industry on topics of special interest.

European Regional Forum overview

The European Regional Forum has been developing and strengthening the existence of the IBA within the whole of Europe by promoting the goals of the IBA to members, non-members and others, disseminating professional know-how, and assisting the committees and other constituencies of the IBA to increase their presence in the different sub-regions of Europe, including parts of North Africa and the Middle East.

The goals of the forum include addressing current and long-term needs of professional organisations and individual members within the geographical reach of the Forum, as well as increasing membership and participation in the IBA and integrating them within the organisation. The Forum will also facilitate cross-border activity between lawyers and bars in different European countries. The Forum has a particular focus on cross-disciplinary activities. It seeks to facilitate relevant networking and information/experience sharing opportunities and encompasses the social and collegial interests of both members and potential members with other regional fora, the Corporate Counsel Forum and the Young Lawyers' Committee and all LPD committees in general. The Forum has 7,700 members and its membership continue to increase as it becomes one of the most integrated and dynamic fora in the IBA.

Contact information

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