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INTERNATIONAL BAR ASSOCIATION CONFERENCE 2026

A conference presented by the IBA Taxes Committee

15th Annual London Finance and Capital Markets Tax Conference

26–27 January 2026, The Savoy, London, England

Working programme

Conference Chair

Jack Bernstein *Aird & Berlis, Toronto, Ontario*

Organising Committee

Sandy Bhogal *Gibson, Dunn & Crutcher, London*

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

Francesco Gucciardo *Aird & Berlis, Toronto, Ontario*

Raul-Angelo Papotti *Chiomenti Studio Legale, Milan*

Susanne Schreiber *Baer & Karrer, Zürich; Quality Officer, Taxes Committee*

Jonathan Schwarz *Temple Tax Chambers, London*

Monday 26 January

All coffee/tea breaks and lunch will take place in the River Room

Registration will take place in the Lancaster Ballroom foyer

All working sessions will be held in the Lancaster Ballroom

0745 – 1900

Registration

0745 – 0830

Networking breakfast

0830 – 1000

Roundtable: taxes after the 2024 storm – is there a way back? The global impact of one big, beautiful bill

- Future of Pillar 2 and a side-by-side system
- The future of Pillar 1 and digital services taxes
- Sections 891, 896 and 899 retaliatory taxation dynamics - is this the future of international tax policy?
- The EU Strikes Backs [another science fiction saga?]: EU state aid rules, ATAD Directives, transfer pricing, joint tax audits on US groups
- Taxing US multinationals: perspectives from jurisdictions disappointed by the final BEPS 2.0 outcome
- Re-emergence of tax competition across jurisdictions

Moderator

Jodi Schwartz *Wachtell Lipton Rosen & Katz, New York*

Speakers

Annabelle Bailleul-Mirabaud *CMS Francis Lefebvre, Neuilly-sur-Seine; Co-Chair, IBA Taxes Committee*

Guillermo Canalejo Lasarte *Uría Menéndez, Madrid*

Morgan Klinzing *Troutman Pepper Locke, Philadelphia, Pennsylvania*

Florian Lechner *A&O Shearman, Frankfurt*

Margriet Lukkien *Loyens & Loeff, Amsterdam*

Joshua Odintz *Holland & Knight, Washington, DC*

Gregory Price *Macfarlanes, London*

Leonard Teti *Cravath Swaine & Moore, New York*

Reporter

Adnand Sulejmani *Ashurst, Luxembourg City*

1000 – 1030

Coffee/ tea break

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1030 – 1130

Leading through complexity: the Tax Director's global view

- Responding to global tax reform
- Reputational risk in light of increased transparency
- Tariffs and the interaction of the Tax and Trade departments
- The increased importance of substance in tax planning
- Building relationships with regulators under scrutiny
- Tax insurance as a strategic tool

Moderator

Michael Lebovitz *Senior Vice President, USCIB, Washington, DC*

Speakers

Sarah Blakelock *Global Head of Tax Controversy, AstraZeneca, London*

Sebastiaan de Buck *Global Head of Tax, Unilever, Rotterdam*

Donald Maher *Vice President Global Tax, Mohawk Industries, Kennesaw, Georgia*

Nathan Powell *Head of Tax, AXA XL, London*

John Stowell *SVP Tax, Incentives & International Financial Reporting, Disney, Burbank, California*

Nicholas Whittington *Koch Industries, Atlanta, Georgia*

1130 – 1240

Global financing under pressure: tax risks, fund structuring and regulatory hurdles

This panel will look at current hot tax topics in the lifecycle of a non-bank financing from inception to termination, including

- Initial lending
 - Regulatory constraints on lending and different tax treatments of direct lending funds whether EU regulated, sovereign or pension or otherwise
 - Structuring to enhance double tax treaty access
- During the term of the financing
 - Beneficial ownership analysis developments
 - Secondary trading
- Repayment/termination issues arising in relation to distressed financings - restructuring and enforcement issues

Moderator

James Somerville *A&L Goodbody, Dublin*

Speakers

Rafael Calvo *Garrigues, London*

Jessica Kemp *White & Case, London*

Mark Leeds *Pillsbury Winthrop Shaw Pittman, New York*

Anette Maier *Allianz Capital Partners, Munich*

Eugenio Romita *Giovannelli e Associati, Milan*

Clemens Schindler *Schindler Rechtsanwälte, Vienna*

Reporter

Wieger Kop *HOUTHOFF, Amsterdam*

1240 – 1340

Lunch

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1340 – 1450

Securitisation transactions: what's next after receivables, and do taxes play a role?

Taking the example of the evolution of real estate securitisation transactions in Italy, the panel will start from looking at the trading of NPL and the treatment of the real estate securities and navigate some recent cross border transactions involving the securitisation of real estate assets. Including a discussion on vehicles and beneficial ownership.

Moderator

Bernadette Accili *Accili Tax & Law, Milan*

Speakers

Adam Blakemore *Cadwalader Wickersham & Taft, London*

Paul Carman *Chapman and Cutler, Chicago, Illinois*

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

Ailish Finnerty *Arthur Cox, Dublin*

Rebeca Rodriguez Martínez *Cuatrecasas, Madrid*

Ayzo Van Eysinga *AKD, Luxembourg City*

Reporter

Javier Calle Bescós *Cuatrecasas, Madrid*

1450 – 1600

Capital in motion: funds, private equity and tax efficiency

1. Entity classification and cross-border inconsistencies

- Classification mismatches across jurisdictions
- Impact of Pillar Two on fund structures and holding companies

2. Private debt /direct lending

- Treaty access, beneficial ownership, and tax residency considerations
- US trade or business (USTB) exposure and management attribution risks

3. Structuring and Operational Challenges

- Substance requirements for holding and platform companies
- Cross-border management company structuring: PE risk, profit allocation, remote work
- Continuation funds, NAV loans, and GP-led restructurings, "ETF-isation" of private funds and the retailisation of alternatives

Moderator

Reinout de Boer *Stibbe, Amsterdam*

Speakers

Andrew Howard *Ropes & Gray, London*

Annette Keller *McDermott Will & Schulte, Munich; Secretary, IBA Taxes Committee*

Ron Nardini *Vinson & Elkins, New York*

Jan Neugebauer *Arendt & Medernach, Luxembourg City*

Reporter

Mathieu Lizotte *PwC Canada, Montréal, Québec*

1600 – 1630

Coffee/ tea break

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Conference dinner sponsors



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Monday continued

1630 – 1715

Navigating real estate around the world

- Trends in real estate around the globe
- RETT mechanics and share deal planning in Austria/Germany
- Anti-abuse screening for real estate vehicles (including real estate provisions in bilateral treaties)
- PE and delegation risk
- Sector spotlight: datacenters

Moderator

Pamela Capps *HSF Kramer, New York*

Speakers

Malte Bergmann *YPOG, Hamburg*

Mariana Díaz-Moro *Gomez-Acebo & Pombo, Madrid; Membership Officer, Europe, IBA Taxes Committee*

Gerald Montagu *Stephenson Harwood, London*

Riccardo Petrelli *Legance, Milan*

Karin Spindler-Simader *Wolf Theiss, Vienna*

Reporter

Adnand Sulejmani *Ashurst, Luxembourg City*

1715 – 1815

Taxing the invisible: IP, intangibles & the future of global planning

- IP structure redesign after minimum tax rules
- Hybrid mismatches and DEMPE in licensing strategies
- Treaty override on software and services withholding
- Taxation of intangibles-driven value and gains
- Disclosure burdens and tax planning consequences
- Sourcing intangible property by R&E personnel costs and activities

Moderator

Sandy Bhogal *Gibson Dunn & Crutcher, London*

Speakers

Marco Adda *BonelliErede, Milan*

Rachel Fox *Al Tamimi & Company, Dubai; Scholarship Officer, IBA Taxes Committee*

Ken Lieon *NautaDutilh, Brussels*

Sonya Manzor *William Fry, Dublin*

David Saltzman *Ropes & Gray, Boston, Massachusetts*

Christian Wimpissinger *BINDER GRÖSSWANG, Vienna*

Reporter

Karanjot Singh Khurana *Lakshmikumaran & Sridharan, New Delhi, Delhi*

1815 – 1900

Global distressed debt restructurings

- Carve-outs, debt hive-ups and internal and external debt restructurings
- Cancellation of debt income recognition and shareholder loan traps
- Worthless and impaired stock and debt considerations
- Insolvency strategies and liability management
- Jurisdictional restructuring regimes and potential treaty relief
- Tax insurance in distressed transactions
- Other cross border issues (e.g. CFC, PE investor, tax attribute, transfer tax, and inversion considerations)

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Monday continued

Moderator

Gordon Warnke *KPMG, New York*

Speakers

Wiebe Dijkstra *De Brauw Blackstone Westbroek, Amsterdam; Corporate Counsel Forum Liaison Officer, IBA Taxes Committee*

Joanna Linfield *Triton Partners, London*

Stefan Mayer *Gleiss Lutz, Frankfurt*

Edward Wei *Gibson Dunn & Crutcher, New York*

Reporter

Javier Calle Bescós *Cuatrecasas, Madrid*

Tuesday 27 January

**All coffee/tea breaks and lunch will take place in the River Room
Registration will take place in the Lancaster Ballroom foyer
All working sessions will be held in the Lancaster Ballroom**

0800 – 1830

Registration

0800 – 0830

Networking breakfast

0830 – 0945

M&A part 1: structuring and strategy

- Debt push down possibilities and constraints
- Recapitalisation measures
- Leveraged transactions / structuring with debt
- Cross border migrations and foreign (triangular) mergers
- Pricing of deals / valuation issues and trends

Moderator

Susanne Schreiber *Bär & Karrer, Zürich; Quality Officer, IBA Taxes Committee*

Speakers

Javier Calle Bescós *Cuatrecasas, Madrid*

Sylvia Dikmans *HOUTHOF, Amsterdam*

Sam Lintonbon *Linklaters, London*

Matthias Scheifele *Hengeler Mueller, Munich*

Timothy Shuman *McDermott Will & Schulte, Washington, DC*

Cesare Silvani *Maisto e Associati, Milan*

Reporter

Mathieu Lizotte *PwC Canada, Montréal, Québec*

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0945 – 1100

M&A part 2: tax risk and compliance

- Indirect transfer of shares
- LOB, PPT and domestic anti-abuse provisions
- Pillar 2 and M&A
- Non-resident indirect capital gains taxes
- Defensive tax measures
- Use and misuse of tax insurance and indemnities

Moderator

Devon Bodoh *Weil Gotshal & Manges, Washington, DC*

Speakers

Francesco Capitta *Facchini Rossi Michelutti, Milan*

Amie Colwell Breslow *Jones Day, Washington, DC*

Olivier Dauchez *Gide Loyrette Nouel, Paris*

Reto Heuberger *Homburger, Zürich*

Mike Lane *Slaughter & May, London*

Amelia O'Beirne *A&L Goodbody, Dublin*

Reporter

Wieger Kop *HOUTHOF, Amsterdam*

1100 – 1130

Coffee/ tea break

1130 – 1230

Insurance in tax-critical transactions

- Beyond M&A: insuring withholding, VAT, TP and RETT risks
- Insurance-linked structures in capital planning
- Claims, exclusions, premium sizing and jurisdictional evolution
- UK, USA, Spain: mature insurance markets; Italy emerging
- Client strategies for using tax insurance as deal protectors
- Broker and underwriter engagement: building tax certainty
- Case studies in active claims and coverage resolutions
- Underwriting tax structuring with dispute anticipation

Moderator

Andrew Quinn *Maples Group, Dublin*

Speakers

Scott Harty *Alston & Bird, Atlanta, Georgia*

Joan Hortala *Cuatrecasas, Barcelona*

Nina Kielman *NautaDutilh, Amsterdam*

Anne-Catherine Lorek *Head of DACH, Director, Howden CAP, Munich*

Hugo Webb *Managing Director, International Tax and Contingency, Ambridge Group, London*

Bartjan Zoetmulder *Loyens & Loeff, London*

Reporter

Mark Galea Salomone *WH Partners, Ta' Xbiex*

1230 – 1315

Global tax disputes: evolving legal standards and strategic litigation trends

- Treaty abuse, override, and GARR case comparisons
- Litigation shaping private equity risk and employee mobility
- Dividend stripping litigation across Europe
- Beneficial ownership and treaty access disputes

Moderator

Guglielmo Maisto *Maisto e Associati, Milan*

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Speakers

Alexander Bosman *Tax Judge, Court of Appeal, The Hague*

Alex Jupp *McDermott Will & Schulte, London*

Ricardo Leon Santacruz *Garrigues, Monterrey*

Sonja Schiller *Regulatory & Litigation Counsel, Google, Seattle, Washington*

Reporter

Elena Kool *De Brauw Blackstone Westbroek, Amsterdam*

1315 – 1415

Lunch

1415 – 1525

The price of certainty: transfer pricing in a world of scrutiny

Building off of the IP discussions on Day 1, our panel will take a deeper dive into transfer pricing developments around the world, including changes to laws in particular jurisdictions, significant transfer pricing cases, examination trends, dispute resolution tools, and planning approaches. We will focus in particular on:

- Transfer pricing and the interaction with anti-avoidance rules and recharacterisation
- Obtaining certainty through MAPs and APAs for transfer pricing and ancillary issues
- Developments on financing transactions, including guarantees
- How tax authorities are applying DEMPE today
- The interaction of transfer pricing and tariffs

Moderator

Richard Slowinski *Alston & Bird, Washinton DC*

Speakers

Sven-Eric Bärsch *Flick Gocke Schaumburg, Frankfurt*

Jisun Choi *Skadden Arps Slate Meagher & Flom, London*

Federico Di Cesare *Lipani Legal & Tax, Milan*

Mariana Eguiarte Morett *Garrigues, Mexico City*

Elissa Romanin *MinterEllison, Melbourne, Victoria; Vice Chair, Taxes Committee*

Philip Tully *Matheson, Dublin*

Reporter

Miguel Pimentel *Garrigues, Lisbon*

1525 – 1625

Game changing deals: the purchase and sale of sports franchises

This panel will explore how the acquisition and holding of professional sports franchises may be structured in various jurisdictions in both the domestic and cross-border ownership contexts. Unique tax and audit challenges as well as the manner in which different jurisdictions address the risks associated with multi-jurisdictional investment structures will also be discussed.

Moderator

Francesco Gucciardo *Aird & Berlis, Toronto, Ontario*

Speakers

Roberto Durate Estrada *Brigagao Duque-Estrada, Rio de Janeiro*

Zoe Feller *Bird & Bird, London*

Malcolm Hochenberg *Proskauer Rose, New York*

Mario Tenore *Pirola Pennuto Zei & Associati, Milan*

Mark Weinstein *Hogan Lovells, New York*

Reporter

Mark Galea Salomone *WH Partners, Ta' Xbiex*

1625 – 1655

Coffee/ tea break

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1655 – 1740

From courts to consequences: key tax rulings driving international policy

- Tax treaty abuse and EU directive abuse
- Beneficial ownership
- Foreign tax credits
- Exchange of information between tax and other authorities
- EU directives and member state tax

Moderator

Jonathan Schwarz *Temple Tax Chambers, London*

Speakers

Caroline Ciraolo *Kostelanetz, Washinton, DC*

Liesl Fichardt *Quinn Emanuel Urquhart & Sullivan, London*

Michael Molenaars *Stibbe, Amsterdam*

Luca Romanelli *AndPartners Tax and Law Firm, Rome*

Christopher Slade *Aird & Berlis, Toronto, Ontario*

Reporter

Karanjot Singh Khurana *Lakshmikumaran & Sridharan, New Delhi, Delhi*

1740 – 1845

Tax in the age of AI and digital assets

This panel will explore how AI and digital assets are reshaping the global tax landscape. We will examine developments ranging from AI in audits, predictive analytics, taxpayer rights, and emerging debates on whether AI agents themselves should be taxed, to the rise of R&D and infrastructure incentives for AI, including large-scale datacentres. The discussion will also cover evolving rules for digital content, and crypto investment structures, highlighting both the opportunities and policy challenges of taxing innovation in an increasingly digital economy.

Moderator

Niklas Schmidt *Wolf Theiss, Vienna*

Speakers

Ramona Cassar *WH Partners, Ta' Xbiex*

Michael Nordin *Schellenberg Wittmer, Zürich*

Caitlin Tharp *Steptoe, Washinton, DC*

Michelle Visbal *Serrano Martinez, Bogota*

Reporter

Thomas Vanhee *Aurifer, Riyadh*

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EU law has become a separate area of law. We are on top of the implementation of Pillar Two and upcoming tax legislation expected from the European Commission in 2026. This includes the recast of the DAC and initiatives to improve the EU's competitiveness and achieve simplification. We closely monitor the pending EC proposal on BEFIT and developments regarding (tax) measures to fund the EU's own budget.

Why choose us?

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Speakers at the conference



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