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INTERNATIONAL BAR ASSOCIATION CONFERENCE 2026

A conference presented by the IBA Taxes Committee

The New Era of Taxation

11–13 November 2026
The Westin Georgetown, Washington DC, USA

Working programme and list of participants

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All speaker materials and biographies can be found at **www.ibanet.org/conference-details/conf2834**

Conference Co-Chairs
Heather Ripley *Alston & Bird, New York; International Organisations Liaison Officer, IBA Taxes Committee*
Joe Sullivan *Covington & Burling, Washington, DC; Membership Officer - North America, IBA Taxes Committee*

Wednesday 11 November

1900 – 2100 **Welcome reception**
The Rooftop at the Graham
Thomas Jefferson St NW, 1075
Washington, DC, 20007

All registered delegates and speakers who are registered for the full conference are welcome to attend.

Thursday 12 November

Working sessions will be held in the Washington Ballroom
Registration, refreshment breaks and lunch will be held in the Washington Foyer

0815 – 1800 **Registration**

0815 – 0845 **Welcome tea/coffee**

0845 – 0900 **Welcome from the Conference co-chairs**
Heather Ripley *Alston & Bird, New York; International Organisations Liaison Officer, IBA Taxes Committee*
Joe Sullivan *Covington & Burling, Washington, DC; Membership Officer - North America, IBA Taxes Committee*

0900 – 1030 **Beyond Pillar Two – the final frontier?**
What is next after the side-by-side agreement? This panel will explore the future of Pillar Two and what may lie beyond, including the potential reconsideration of Pillar One, the renaissance of Digital Services Taxes, developments at the UN and responses from developing countries.

Moderators
Nadia Altenburg *Bluebird Legal & Tax, Hamburg*
Loren Ponds *Skadden Arps Slate Meagher & Flom, Washington, DC*

Speakers
John Connors *Chair of Global Tax Commission, International Chamber of Commerce, London*
Mindy Herzfeld *Potomac Law Group, Washington, DC*
Tsedey Girma Mengistu *BonelliErede, Addis Ababa*
Natalia Quinones Cruz *Quiñones Cruz, Bogotá*

Session reporter
Shiv Singhal *Nishith Desai Associates, New Delhi, Delhi*

1030 – 1100 **Coffee/tea break**

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Conference dinner sponsors

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Thursday 12 November

1100 – 1230 **Effects of global mobility on business structuring**

What happens to entities when their owners (and not their representatives or management) move? This panel will explore the tax consequences for business entities, as well as trusts and other organisations, when an individual owner or trust settlor/beneficiary relocates, and we will discuss relevant planning options that may be available.

Moderators
Seth Entin *Greenberg Traurig, Miami, Florida*
Frank Tschesche *Graf von Westphalen, Frankfurt*

Speakers
Ramona Cassar *WH Partners, Ta' Xbiex; Membership Officer, Africa & Middle East, IBA Taxes Committee*
Chloe Delion *CMS Francis Lefebvre, Neuilly-sur-Seine*
Corina Lechuga *Garrigues, Mexico City*
Michael Ruttili *Stephenson Harwood, London; Conference Quality Officer, IBA Private Client Tax Committee*
Aaron Schumacher *Charles Russell Speechlys, New York*

Session reporter
Manon Prestigio *Gide Loyrette Nouel, New York*

1230 – 1300 **Keynote address**
Isaac Wood *Deputy International Tax Counsel, Office of Tax Policy, Department of the Treasury, Washington, DC*

1300 – 1400 **Lunch**

1400 – 1515 **Emerging trends in administrative tax controversy**

As tax authorities seek to fill budget gaps in an increasingly resource constrained environment, taxpayers and advisors must adapt to a rapidly shifting administrative controversy landscape. This panel will explore the effect of shifting administrative policies on the Internal Revenue Service and other tax authorities, look at the current state of audits and administrative controversies in various jurisdictions and explore best practices for successfully resolving disputes without litigation.

Moderators
Antonio Barba de Alba *Cuatrecasas, Barcelona*
Melissa Wiley *Kostelanetz, Washington, DC*

Speakers
Amanda Heale *Torys, Toronto, Ontario*
Ivonne Montaño *Galicia Abogados, Mexico City*
Indu Subbiah *Area Director, Internal Revenue Service, Washington, DC*

Session reporter
Jesse Boretsky *Covington & Burling, New York*

1515 – 1545 **Coffee/tea break**

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Conference luncheon sponsors

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Thursday 12 November

1545 – 1700 **Hot topics in cross-border M&A**

This panel will walk through many of the issues du jour in cross-border M&A tax, including the effects of the One Big Beautiful Bill Act in the US, the increasing impact of anti-abuse rules on deal structures and the ongoing effects of Pillar Two. Is the US now a more desirable TopCo jurisdiction based on recent developments? Our panel will discuss all this and more.

Moderators
Malcolm Hochenberg *Proskauer Rose, New York*
Imme Kam *Loyens & Loeff, Amsterdam; International Organisations Liaison Officer, IBA Taxes Committee*

Speakers
Susana Estêvão Gonçalves *Perez-Llorca, Lisbon*
Gouri Puri *Shardul Amarchand Mangaldas, New Delhi, Delhi; Conference Coordinator, IBA Tax Committee*
Dominic Robertson *Slaughter and May, London*
Jennifer Sabin *Gibson Dunn, New York*

Session reporter
Laurens Hoek *Loyens & Loeff, New York*

1700 – 1815 **Emerging trends in tax controversy litigation**

When all else fails, litigate. This panel will look at emerging trends in tax litigation and explore best practices across key jurisdictions.

Moderators
Charanya Lakshmikumaran *Lakshmikumaran & Sridharan, New Delhi, Delhi; Newsletter Editor, IBA Taxes Committee*
Christopher Slade *Aird & Berlis, Toronto, Ontario*

Speakers
Judge Anthony Gafoor *Tax Appeal Court of Trinidad and Tobago, Port of Spain*
James Kelly *Deputy Associate Chief Counsel, International (Controversy & Litigation), Internal Revenue Service, Washington, DC*
Kevin Otero *Covington & Burling, Washington, DC*
Jin Mo Yang *Yulchon, Seoul*

Session reporter
Pascal Hornstein *Qorptax, Hamburg*

1900 – 2200 **Conference dinner**

Bobby Van's Steakhouse
15th St NW , 809, Washington , District of Columbia, 20005

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Friday 13 November

Working sessions will be held in the Washington Ballroom
Registration, refreshment breaks and lunch will be held in the Washington Foyer

0830 – 1600 **Registration**

0830 – 0900 **Welcome coffee/tea**

0900 – 1030 **Tax policymaking: how the sausage gets made**

How the tax sausage is made - this panel will look at tax policymaking and the evolving role of tax advisors in 2026 and beyond.

Moderators
Joseph Boddicker *Alston & Bird, Washington, DC*
Rachel Fox *Al Tamimi & Company, Dubai; Scholarship Officer, IBA Taxes Committee*

Speakers
Vittoria Di Gioacchino *BLP, San Jose*
Wiebe Dijkstra *De Brauw Blackstone Westbroek, Amsterdam; Corporate Counsel Forum Liaison Officer, IBA Taxes Committee*
Jonathan Goldman *Senior Tax Counsel, Senate Finance Committee Democratic Staff, Washington, DC*
Kevin Nichols *Senior Director, Tax Policy and Strategic Projects, Uber, Arlington, Virginia*
Don Snyder *Deputy Assistant Secretary (Tax Administration, Energy & Strategic Initiatives), Office of Tax Policy Department of the Treasury, Washington, DC*

Session reporter
Matisse Lebrun *Elvinger Hoss Prussen, Luxembourg City*

1030 – 1100 **Coffee/tea break**

1100 – 1230 **Old systems, new issues: transfer pricing in a changing world**

Are transfer pricing rules still fit for purpose? This panel will discuss emerging topics in transfer pricing, including the treatment of AI services and the digital economy, the taxation of data centres and interactions with Pillar Two, and will explore best practices for advising clients and achieving certainty in a rapidly changing world.

Moderator
Joe Duffy *Matheson, Dublin, Ireland; Vice Chair, IBA Taxes Committee*
Stefanie Kavanagh *BakerHostetler, Washington, DC*

Speakers
David Farhat *Skadden Arps Slate Meagher & Flom, New York*
Bruna Camargo Ferrari *Camargo & Ferrari Advogados, São Paulo*
Cory Hillier *Senior Counsel, International Monetary Fund, Washington, DC*
Fernando Tonanni *Machado Meyer Advogados, São Paulo; Co-Chair, IBA Taxes Committee*
Jerome Tse *Mallesons, Sydney, New South Wales*

Session reporter
Simone Schiavini *Legance, Milan*

1230 – 1400 **Lunch**

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Friday 13 November

1400 – 1530 **Hot topics in investment funds taxation**

This panel will examine the latest developments in the taxation of investment funds. Topics will include the taxation of sovereign wealth funds and recent regulatory developments in the US and the taxation of cryptocurrency, among others.

Moderators
Joan Arnold *Professor of Practice, Villanova University Graduate Tax Program, Philadelphia, Pennsylvania*
Jean Schaffner *Schaffner Tax and Legal, Luxembourg City*

Speakers
Marco Adda *BonelliErede, Milan*
Ailish Finnerty *Arthur Cox, Dublin*
Heath Martin *Chapman and Cutler, New York*
Sneh Shah *Khaitan & Co, Mumbai, Maharashtra*

Session reporter
Riccardo Petrelli *Legance, Milan*

1530 – 1600 **Coffee/tea break**

1600 – 1800 **Roundtables on current developments**

1. Tax and technology
Dave Garcia *VP of Tax, Sovos, Washington, DC*
Caitlin Tharp *Steptoe, Washington, DC*
Thais de Barros Meira *BMA Advogados, São Paulo; Webinar Officer, IBA Taxes Committee*

2. Treaty developments
Margriet Lukkien *Loyens & Loeff, Amsterdam*
Daniela Rey *Bruchou Funes de Rioja, Buenos Aires; Membership Officer – South America, IBA Taxes Committee*

3. Energy/resource taxation
Leonardo Homsy *Mattos Filho, Rio de Janeiro*
Eyvind Sandvik *Arntzen Grette, Oslo*

4. Tariffs / supply chain planning
Elizabeth Stevens *Caplin & Drysdale, Washington, DC*
Gerardo Canseco *Chevez Ruiz Zamarripa, Mexico City*

5. Tax insurance / litigation funding
Seth Buchwald *Alston & Bird, Atlanta, Georgia*
Larissa Wagner *BINDER GRÖSSWANG, Vienna*

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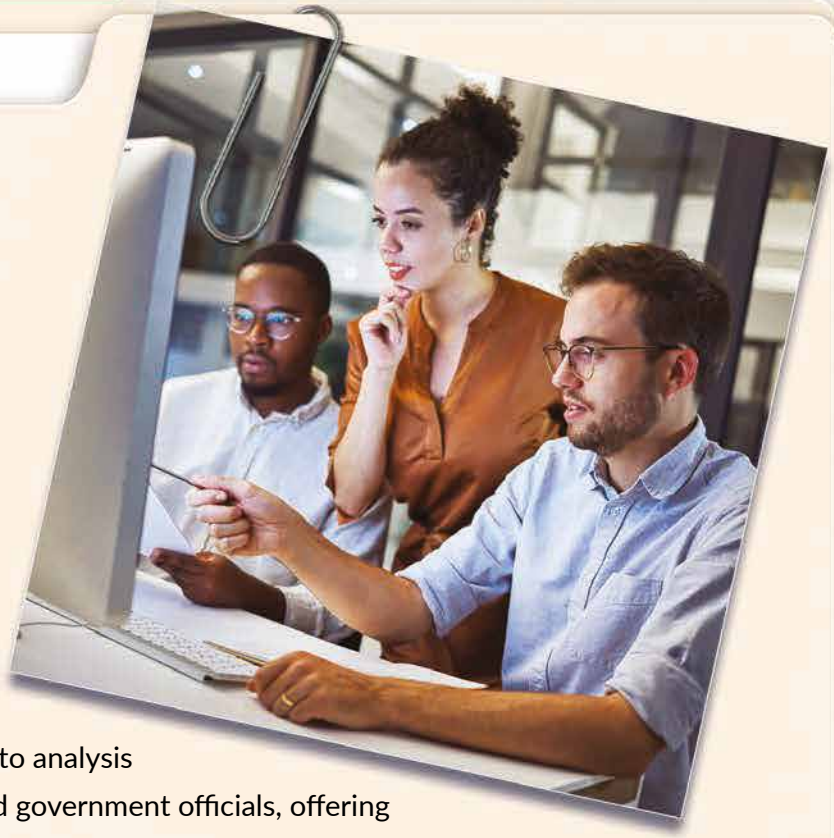
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