2nd Annual International Taxation Conference
A one-day conference at the Hotel de France on Tuesday 20 February 2018
7 hours' CPD

- Chris Usher, Jersey International Business School (Chairman)
- Dr. Max Lienemeyer, European Commission (Keynote speaker)
- An OECD Expert (Keynote speaker)
- Debbie Payne, PwC
- Paul Morton, The Office of Tax Simplification
- Derek Scott, KPMG LLP (UK)
- Nicola Roberts, Deloitte LLP
- Andrew Bougourd, PwC
- Mark Persoff, EY
- Marcus Pallot, Carey Olsen
## Agenda

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<tr>
<th>Time</th>
<th>Session</th>
<th>Speaker</th>
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<tr>
<td>08:30–09:00</td>
<td>REGISTRATION &amp; REFRESHMENTS</td>
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<tr>
<td>09:00–09:15</td>
<td>Opening address</td>
<td>Chris Usher (Chairman) Chief Executive Officer of Jersey International Business School</td>
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<tr>
<td>09:15–09:45</td>
<td>How Jersey is leading the way in international tax transparency</td>
<td>An expert from the Organisation for Economic Co-operation and Development (OECD) (Keynote speaker)</td>
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<tr>
<td>09:45–10:15</td>
<td>Tax rulings and state aid control considerations</td>
<td>Dr. Max Lienemeyer (Keynote speaker) Head of Tax Planning Practices Unit and Directorate General for Competition at the European Commission</td>
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<td>10:15–10:45</td>
<td>Can we simplify the UK tax code, and if so what are the possible implications?</td>
<td>Paul Morton Tax Director at The Office of Tax Simplification</td>
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<td>10:45–11:15</td>
<td>Where next for global transparency initiatives?</td>
<td>Panel discussion</td>
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<td>11:15–11:30</td>
<td>BREAK</td>
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<td>11:30–12:00</td>
<td>Managing tax risk – a tax risk is a situation involving exposure to danger, harm or loss arising from a tax-related matter</td>
<td>Debbie Payne Tax Director at PwC</td>
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<td>12:00–12:30</td>
<td>Effective policy &amp; procedure requirements post Criminal Finances Act 2017</td>
<td>Marcus Pallot Partner at Carey Olsen</td>
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<td>12:30–13:00</td>
<td>Are the recent changes to the UK tax landscape helping or hindering?</td>
<td>Panel discussion</td>
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<td>13:00–14:00</td>
<td>LUNCH</td>
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<td>14:00–14:30</td>
<td>Non-resident landlord considerations and the potential requirement to correct</td>
<td>Andrew Bougourd Senior Manager – Tax at PwC</td>
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<td>14:30–15:00</td>
<td>HMRC's investigations into offshore matters</td>
<td>Derek Scott Head of Tax Investigations at KPMG LLP (UK)</td>
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<td>15:00–15:30</td>
<td>HMRC's approach to offshore tax planning</td>
<td>Panel discussion</td>
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<td>15:30–15:45</td>
<td>BREAK</td>
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<td>15:45–16:15</td>
<td>Recent tax changes – implications for private clients</td>
<td>Nicola Roberts Partner, Head of Private Client Services at Deloitte LLP</td>
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<td>16:15–16:45</td>
<td>How is tax policy likely to develop post-Brexit?</td>
<td>Mark Persoff Tax Partner, EMEIA Financial Services Practice at EY</td>
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<tr>
<td>16:45–17:00</td>
<td>Closing address</td>
<td>Chris Usher (Chairman) Chief Executive Officer of Jersey International Business School</td>
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### Submit your questions via our interactive mobile app

Audience interaction is guaranteed with our audience participation tool Sli.do. This tool can be accessed via the App Store on iOS and Android devices, or online at www.slido.com. You can vote on poll questions from the speakers and also ask questions anonymously and these will appear on the screen at the end of each presentation.

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### Speakers’ slides

Electronic copies of our speakers’ slides are available for 7 days after the event. These will be made available on the day of the event for you to download in full high-quality resolution on your laptops, tablets or mobile devices to follow and make notes.
Meet the Chairman & Keynote speakers

Chris Usher (Chairman)
Chief Executive Officer
Jersey International Business School

Chris has over 20 years’ experience in international financial services, working both in the UK and offshore, for major financial institutions such as Barclays Wealth and Santander.

Formerly an International Investment Manager he advised both individuals and corporate entities on complex investment scenarios. He now specialises in delivering training in investment management, taxation and regulatory matters in international finance centres around the world.

Chris is a specialist chairman of a number of high-profile events, including conferences such as the Annual Compliance & Economic Crime Symposium and the International Taxation Conference. As an expert in the financial crime risks posed to international offshore financial centres, Chris was invited to speak at the Association of Certified Anti-Money Laundering Specialists (ACAMS) conference on the topic of ‘Understanding the Criminal Vulnerabilities of Offshore Products and Services’.

An expert from the Organisation for Economic Co-operation and Development (OECD) (Keynote speaker)

The mission of the Organisation for Economic Co-operation and Development (OECD) is to promote policies that will improve the economic and social well-being of people around the world.

The OECD provides a forum in which governments can work together to share experiences and seek solutions to common problems. We work with governments to understand what drives economic, social and environmental change. We measure productivity and global flows of trade and investment. We analyse and compare data to predict future trends. We set international standards on a wide range of things, from agriculture and tax to the safety of chemicals.

We also look at issues that directly affect everyone’s daily life, like how much people pay in taxes and social security, and how much leisure time they can take. We compare how different countries’ school systems are readying their young people for modern life, and how different countries’ pension systems will look after their citizens in old age.

Drawing on facts and real-life experience, we recommend policies designed to improve the quality of people’s lives.

Dr. Max Lienemeyer (Keynote speaker)
Head of Tax Planning Practices Unit
Directorate General for Competition at the European Commission

Dr. Max Lienemeyer is the Head of Unit for the Competition Directorate General of the European Commission in Brussels.

After graduating with a law degree in 1993 in Frankfurt, he obtained a LL.M in International Legal Co-operation from the Vrije Universiteit Brussel and a PhD from the law faculty of the University of Frankfurt.

He has worked for the European Commission since 2003, where his first assignment was to assess rescue and restructuring aid cases in the manufacturing industries. He subsequently moved to the anti-trust unit dealing with financial services.

From 2009 to 2013 he was Deputy Head of Unit in the European Commission’s financial crisis task-force dealing with State aid cases in the banking sector.

Since 2013 he has headed a task force, which in 2016 converted into a unit, in charge of tax planning practices, which is responsible for application of State aid rules to tax planning structures by multinationals (the unit is i.a. in charge of the Apple case).
Meet the speakers

Derek Scott
Head of Tax Investigations
KPMG LLP (UK)

Derek is an Associate Partner who joined KPMG in 1997. Prior to this time he was an Inspector of Taxes in the Inland Revenue. Derek advises individuals, families, trusts and companies who are under enquiry by HMRC. He specialises in serious fraud investigations, voluntary disclosures being made to HMRC and complex enquiries involving offshore assets.

In recent years Derek has been heavily involved in advising clients who have used the tax disclosure regimes available in the UK including the Liechtenstein Disclosure Facility. He is now also advising clients in connection with HMRC’s “Requirement to Correct” and, linked with this, the Worldwide Disclosure Facility as we move into the new era of global transparency.

Paul Morton
Tax Director
The Office of Tax Simplification

Paul Morton was appointed Tax Director of the Office of Tax Simplification on 1st March 2017. Prior to that he was Tax Director for RELX Group plc for 12 years and was actively engaged with the OECD and tax policy makers in the UK, US and the Netherlands and at EU level on tax policy matters.

Previously, he was a Tax Manager and Adviser at Royal Dutch Shell for 16 years, holding several UK and overseas roles. He moved to Shell from KPMG where he focussed on international tax and insurance. He read Microbiology at University College London, before joining the Inland Revenue as a Tax Inspector.

Paul is a Fellow of the Chartered Institute of Taxation, a member of the Council of the Institute for Fiscal Studies and the Tax Law Review Committee, an adviser to the International Chamber of Commerce Taxation Commission and a member of the Executive Committee of the International Fiscal Association.

Nicola Roberts
Partner, Head of Private Client Services
Deloitte LLP

Nicola has specialised in advising individuals, their businesses and trustees, both based in the UK and overseas for over 20 years. She is head of Deloitte Private Client Services and particularly works with non-UK domiciled or non-UK resident individuals and family offices as well as investors into UK real estate.

Nicola is a Chartered Tax Adviser and is a qualified Chartered Certified Accountant. She is listed in the Citywealth Top 100 leaders list and Spear’s Tax Adviser Index (profile of the best accountants and tax and trust lawyers for HNWs in the UK). Nicola is actively consulted by the Treasury and HMRC especially on internationally focussed issues such as residence and domicile matters.
Debbie Payne
Tax Director
PwC

Debbie Payne is a director in our Channel Islands tax practice and has been a corporate tax specialist for over twenty years. Before transferring to the Channel Islands in September 2013 she spent 10 years working in the asset management tax practice in London. During this time she has worked on a wide range of fund structuring projects including hedge funds and private equity funds advising on the structuring of both the management entities and the funds. She continues to advise a number of hedge fund managers particularly those with operations in the Islands. In addition, she has extensive experience of advising clients on dealing with enquiries from tax authorities and their views on what is acceptable tax planning. More recently she has been looking at the impact of the OECD’s initiative on Base Erosion and Profit Shifting which can fundamentally change the tax risk assessment of an organisation or investment fund. Debbie is a member of AIMA’s working party on FATCA and speaks at conferences on various topics relevant to the asset management industry.

Andrew Bougourd
Senior Manager, Tax
PwC

Andrew Bougourd specialises in personal and offshore trust company taxation. He has more than 20 years’ experience working for professional service practices and trust companies. A qualified accountant and Chartered Tax Adviser, he was called to the Bar in 2013. He has held a number of directorships at both local accountancy firms and trust companies and has supported clients on a range of taxation issues, including areas such as property, complex trust matters and tax investigations. Andrew has wide experience working for both finance industry firms and within professional service practices, giving him a special insight into the needs of clients.

Marcus Pallot
Partner
Carey Olsen

Marcus Pallot is a partner in the dispute resolution and litigation team in Jersey. His practice covers insolvency, regulatory issues and trust litigation. His insolvency work involves a number of successful, innovative applications which have expanded the reach of Jersey’s insolvency laws. He represents many local financial services businesses and banking organisations in respect of regulatory actions. Trust litigation makes up a large part of his practice and he also leads the eGaming team and has been involved in this area since the inception of the eGaming industry. Marcus is ranked as a leading individual in the Legal 500, 2017 edition and has been a partner at Carey Olsen since 2009. He was called to the Bar in England and Wales in 1997 and qualified as a Jersey advocate in 2004.
Mark Persoff
Tax Partner, EMEIA Financial Services Practice
EY

Mark is a Tax Partner in Ernst & Young’s Financial Services practice in London. Before joining EY in 2011, he was a tax partner at a leading magic circle law firm in London. Mark has specialised in international and European taxation issues, particularly for financial institution clients, for 20 years – acting both on general advisory basis as well as on a large number of M&A transactions, financings and restructurings, and on disputes with UK and other tax authorities.

Mark currently leads EY’s financial services tax practice on Brexit matters, and has been working since the referendum vote in June 2016 with a number of multinational financial services organisations, including banks, insurers and asset managers, on their Brexit projects.

Mark also heads up EY’s European financial services tax policy team.

Mark has been ranked as a leading tax adviser by publications such as Legal 500, Chambers & Partners and the World’s Guide to the Leading Tax Advisers.
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