London Branch/King’s College London 8th International Tax Conference

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Alvaro Benavides, LLM Class of 2018 reports

The Great Hall of King’s College London was the venue of the 8th International Tax Conference, held jointly by ATT/CIOT London Branch and the Dickson Poon School of Law of King’s College London on 20 March 2018 and attended by 160 delegates. The conference was chaired by Jonathan Schwarz of Temple Tax Chambers, a leading barristers specialising in international tax and head of the LLM in International Tax program at King’s. A variety of highly topical international tax issues were discussed, starting with Jonathan Schwarz analysing the most recent relevant international tax cases and disputes. The first panel of experts discussed Global Tax Developments. Renata Ardous, International Tax Director at Mazars, spoke about the way in which investors structure their business in China and the Middle East in an efficient tax manner in today’s international tax context. Lee Holloway, Head of Tax, Next Plc, addressed the different tax and customs challenges for UK businesses with global supply chains that resulting from the UK decision to withdraw from the EU. David Klass, partner in Gide’s London tax practice, completed the picture by looking at recent EU taxation developments and considered their likely impact on UK business post-Brexit.

The keynote speaker was, Melinda Brown, senior transfer pricing advisor at the OECD. Melinda explained the challenges that the OECD is currently tackling especially those that remain pending in the BEPS project and also the focus of the OECD’s work for the coming years in transfer pricing.

The first afternoon session was on US tax reform and what UK businesses need to know about it. The panel was lead by Jeffrey Trinklein, partner in Gibson Dunn & Crutcher and Co-Chair of the firm’s tax practice group and supported by Giles Parsons, Senior Tax Director of Caterpillar Inc. and Leif Jorgensen, of the EU US Tax Desk in London. Together they provided a detail presentation of the ins and outs of US tax reform.

The final panel provided a perspective on UK International tax developments. David Saleh, partner at Clifford Chance, explained the existing and proposed tax treatment of non-resident investment and dealing in UK land. Erika Lupe, partner in Osborne Clarke and their UK head of international tax analysed technology transactions and the proposed expanded withholding tax on royalties. Tom Matthews of the HMRC Tax Treaty Team, completed the day with an explanation of the UK position on the BEPS Multilateral Instrument.