

22 July 2010

Dear Colleague,

3rd Young International Corporate Tax Practitioners' Conference in association with the International Fiscal Association, British Branch Monday, 6 September 2010

We are very pleased to invite you to our 3rd Young International Corporate Tax Practitioners' Conference on Monday, 6 September 2010.

This popular conference is particularly relevant for ADIT students, completed ADIT's and International Tax Affiliates of the Chartered Institute of Taxation.

This event has been organised by some of the younger members of the European Branch of the Chartered Institute of Taxation in association with colleagues from the British Branch of the International Fiscal Association. The Conference is designed to focus on the hot topics in international taxation for multinational companies and international practitioners.

This year we will be discussing three key topics where new issues and opportunities are impacting on multinational businesses:

- **CORPORATE RESIDENCE - THE LATEST DEVELOPMENTS AND THE IMPACT ON INTERNATIONAL OPERATIONS.**
- **THE UK AS AN INTERNATIONAL HOLDING COMPANY LOCATION? HOW IS THIS AFFECTED BY FOREIGN PROFITS REFORM?**
- **THE TAXATION OF INTELLECTUAL PROPERTY**

A full programme is attached, which gives details of our speakers. Space is limited and bookings will be taken on a first come first served basis, so please book early to avoid disappointment.

The cost of each place is £95 (or euro equivalent) and includes refreshments, a buffet lunch and conference documentation. The conference is followed by a reception.

Bookings should be posted, faxed or e-mailed to Christine Barwell, at the Chartered Institute of Taxation, to whom all communications regarding the conference should be sent.

A map of the conference venue is also attached. **Please retain these papers as no further documentation, other than a receipt for your payment, will be sent prior to the event.**

I look forward to seeing you on the day.

Yours sincerely,

Deborah J Hicks

Deborah J Hicks
Secretary, European Branch

THE CHARTERED INSTITUTE OF TAXATION EUROPEAN BRANCH
IN ASSOCIATION WITH
THE INTERNATIONAL FISCAL ASSOCIATION BRITISH BRANCH

**3rd YOUNG INTERNATIONAL CORPORATE TAX PRACTITIONERS'
CONFERENCE – MONDAY, 6 SEPTEMBER 2010**

**at the Auditorium,
Deloitte 2 New Street Square
London
EC4A 3BZ.**

PROGRAMME

10.00 Registration and coffee

10.35 Introduction by co-Chairs:
Arun Birla, Partner, *Paul Hastings*
Ed Wright, Director, *Deloitte LLP, London*

CORPORATE RESIDENCE - THE LATEST DEVELOPMENTS AND THE IMPACT ON INTERNATIONAL OPERATIONS

10.45 **Mike Lane**, Partner, *Slaughter & May, London*
Corporate Inversions and company migrations.

11.10 **Johann Müller**, Head of Group Tax Risk Management, A.P. *Møeller Maersk AS,*
Copenhagen
Corporate residence laws - the constraints on efficient international
operations.

11.35 **David Price**, Team Leader and delegated Competent Authority for DTR, Outward
Investment Team, Business International, *HMRC*
The Revenue's current approach to entity classification.

12.00 Questions and discussion

12.15 Lunch

THE UK AS AN INTERNATIONAL HOLDING COMPANY LOCATION? HOW IS THIS AFFECTED BY FOREIGN PROFITS REFORM?

13.30 **Willem Bon**, Tax Lawyer and Partner, *Loyens & Loeff, London*
European holding company centres - how does the UK compare with
the Netherlands and other continental European locations.

13.55 **Joanne Pleasant**, Director, *Deloitte LLP, London*
Controlled foreign companies - What can we expect from a new regime.

14.20 **An exemption for foreign branch profits - how would it affect UK corporates operating abroad?**

Kirsten White, Head of UK Tax, *Shell UK, London*

Ian Menzies-Conacher, Managing Director Group Taxation, *Barclays, London*

15.00 Questions and discussion

15.15 Tea/Coffee

THE TAXATION OF INTELLECTUAL PROPERTY

15.45 **Helen Jones**, Senior Vice President, Global Tax, GlaxoSmithKline, *London*
How does intellectual property taxation affect multinational operations?

16.10 **Steven Cawdron**, Senior Manager, *Ernst & Young, London/Reading*
Valuation and transfer pricing issues.

16.35 Speaker to be confirmed.
The legal background to IP taxation.

17.00 Questions and discussion

17.15 Champagne reception.

Next Meeting

Milan Conference, Friday 15 October 2010

Date for your Diary

14th Cross-Atlantic and European Tax Symposium

Friday, 19th November 2010, London

CO-CHAIRS AND SPEAKERS

Arun Birla is a Partner in the Tax practice of the Paul Hastings London office. Arun advises both UK and international clients on the tax consequences of inward and outward investment, joint ventures, private equity funds and transactions, oil and gas investments, employment related matters, co-investing structuring, financing arrangements and corporate mergers, demergers, reorganisations, restructurings and acquisitions. Arun is an active member of the UK branch committee of the International Fiscal Association and is the current Chair of the UK Young IFA Network.

Ed Wright is a Director in Deloitte's International Tax practice in London. He advises multinational corporations on UK and cross-border corporate tax issues. His particular focus is on UK parented groups operating overseas and he advises on funding, profit repatriation and the application of the UK's CFC rules. Ed is currently advising a number of groups on the impact of the significant changes to the "taxation of Foreign Profits" in Finance Act 2009. Ed is a Chartered Accountant and a member of the Chartered Institute of Taxation.

Mike Lane is a Partner in the tax department of Slaughter and May. Mike's practice covers all direct taxes, stamp duties, VAT and, in particular, corporation tax. He has extensive experience in advising on mergers and acquisitions, capital markets transactions, group reorganisations and structured finance.

Johann Müller is Head of Group Tax Risk Management at A.P. Møller Maersk A/S. He has been with the company for four years. His areas of work covers all countries and all business units of the A.P. Møller-Maersk group. He has a particular interest in tax developments in EU direct taxation and the tax work of the OECD and the UN. Johann is trained as a Dutch international tax lawyer, has 20 year experience and has worked for various Dutch law firms in the Netherlands, the UK and the US.

David Price is team leader and delegated Competent Authority for DTR within the wider Outward Investment Team of HMRC's Business International. His team has both policy and technical responsibility for DTR, entity classification, certificates of residence and treaty issues arising for UK resident companies with the exception of those concerning the Business Profits and Interest Articles.

Willem Bon is a tax lawyer and partner at Loyens & Loeff and heads the international tax practice of the London office. He acts as Dutch tax counsel in M&A, structured finance transactions and securitisations. His clients include Dutch and foreign multinationals, funds and high-net-worth individuals. Willem is a member of the Dutch Association of Tax Advisers (NOB), the International Fiscal Association (IFA) and International Bar Association (IBA). He graduated *cum laude* in Dutch law at the University of Utrecht in 1987 and has since worked for Loyens & Loeff.

Joanne Pleasant is a Director in tax at Deloitte in London specialising in International tax with a particular focus on international property groups. Jo has been with the firm since 1998 and is both ICAEW and CTA qualified. During 2008. She spent nine months on secondment from Deloitte to HM Treasury working as part of the team responsible for the policy development for the taxation of foreign profits reform package. Since returning from her secondment Jo has been closely involved in the consultation process on foreign profits reform with HMRC and the Treasury and is one of the firm's experts in this area.

Kirsten White is currently the Head of UK Tax for Shell. She is Chairman of UKOITC, a representative body for tax issues encountered by oil and gas companies, and a member of the fiscal forum of Oil and Gas UK. Kirsten spends much of her time working with O&G Industry members and Government officials talking on policy issues and proposed tax law change. Kirsten also sits on the UK Business Tax Forum, which contains senior representatives from large businesses, and has its primary role as fostering stronger relationships and greater understanding between large businesses, HM Revenue and Customs and the Treasury.

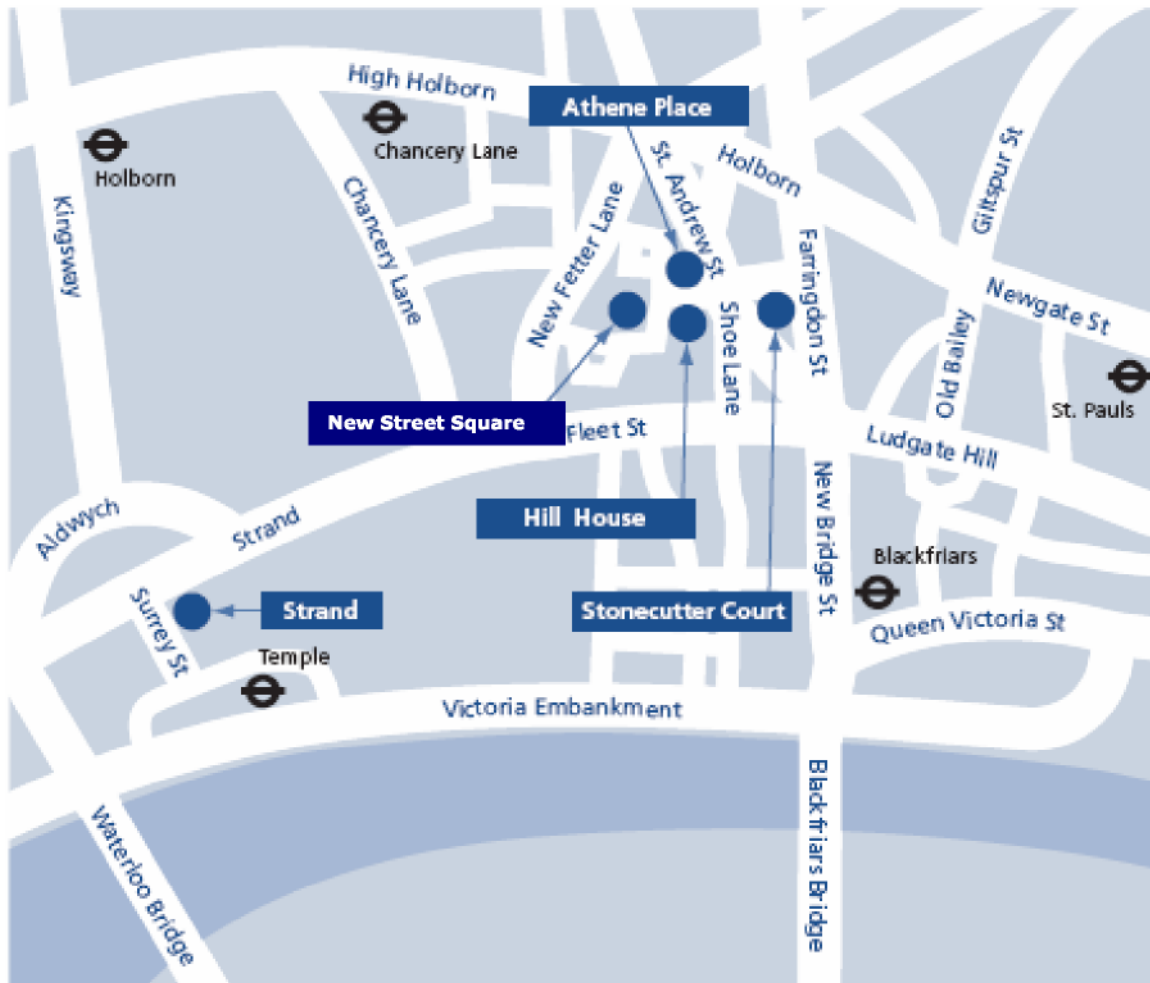
Ian Menzies-Conacher is a member of the Institute of Chartered Accountants, the Institute of Bankers and the Institute of Taxation; where he is currently Chairman of the Technical Committee, a past chairman of the International Tax sub-committee and a member of Council. He's worked for Barclays, where he is now Managing Director Group Taxation, for some 30 years and has had a wide involvement in industry and professional activities. He chairs the British Bankers Association tax committee, is the UK representative on European Banking Federation Tax Committee and a member of CBI and 100 Group Tax committees. He is also on the Executive Committee of The Institute for Fiscal Studies and is a member of the Tax Law Review Committee. He was appointed as a member of the First Tier Tax Tribunal on its inception in April 2009.

Helen Jones is Senior Vice President, Global Tax, GlaxoSmithKline, London. Helen joined Arthur Andersen in tax in London in 1985, and trained as a Chartered Accountant. She left Arthur Andersen in 1996 as a senior manager in the financial markets group, and joined Reuters as Deputy Tax Director. She spent 18 months in New York heading the US tax function, and returned to London in 2001 to become Global Head of Tax for Reuters. In 2003 she took on additional responsibility for Treasury and worked closely with the Trustees of the final salary schemes to advise on investment strategy. Helen was also Chairman of the Reuters defined contribution plan for six years. She joined GlaxoSmithKline in 2008, as SVP Global Tax.

Steven Cawdron is a Senior Manager with Ernst & Young's Transfer Pricing and Tax Efficient Supply Chain group in London/Reading. Steven has over nine years experience in transfer pricing working in the Big 4 / International law firms covering all aspects of transfer pricing, including planning, documentation, controversy and Advance Pricing Agreements. He has worked across all industry sectors and developed a special interest in the area of intellectual property planning, valuation and migration.

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