

# INTERNATIONAL TAX CONFERENCE 2024

23 AND 24 MAY 2024  
VADUZ, LIECHTENSTEIN

*Organized by*  
The International Tax Law Research and Policy Network

*Co-Organized by*  
Felder Sprenger + Partner AG

**ITL** RESEARCH  
NETWORK

FIS  
P



# INTERNATIONAL TAX CONFERENCE

## «TAXATION OF TRUSTS, FOUNDATIONS AND SIMILAR ARRANGEMENTS IN A GLOBAL SETTING»

Today the world is faced with economic and political uncertainties. These uncertainties **put the discussion around asset protection to the forefront**. In particular, the discussion around the use of Trusts, Foundations and Similar Arrangements becomes crucial as such Arrangements have been used since decades as vital asset protection tools. **Moreover, the current international tax landscape keeps evolving which could majorly impact the use of asset protection arrangements.**

Against this background, the **International Tax Law and Policy Research Network** has launched a book project aimed to address **Taxation of Trusts, Foundation and Similar Arrangements in a Global Setting**. The main purpose of the book project is to undertake a comprehensive examination of the various international tax-related challenges these mechanisms present, particularly, in a cross border context.

The proceeds of the book will be discussed at our tax conference, taking place on **May 23 and 24, 2024 in Vaduz, Liechtenstein**. This conference shall follow the success of the previously held conferences in Belgrade (2022) and Milan (2023).

The conference agenda is divided into eight sessions. The first session starts with addressing **Global Tax Developments affecting Trusts, Foundations and Similar Arrangements** as well as the **Approach adopted by selected Tax Administrations towards auditing such Arrangements**. The second session shifts the focus and discusses why the **Legal Characterization of such Arrangements is relevant for Tax Purpose**. The third session will provide jurisdictional updates on the **Tax Treatment of such Arrangements, analyzing the main Cross Border Tax Issues**. The fourth session will provide insights on various tax issues that arise when **Trusts, Foundations and other Similar Arrangements are used for Philanthropic Purposes**. The fifth session will examine **Tax Treaty Issues** related to such Arrangements. The sixth session deals with **EU Tax Law and Exchange of Information Implications**. The seventh session takes on **Specific Challenges of such Arrangements for Transaction, Inheritance and Wealth Tax Purposes**. The last session addresses the **Impact of Pillar II (Global Minimum Tax) and Transfer Pricing Rules** on Trusts, Foundations and Similar Arrangements.

The speakers in this event include renowned experts with different backgrounds from **academia (Professors from several Universities), private practice, national tax administrations / government officials as well as experts from International Policy Making Organisations such as the OECD, EU Commission and the United Nations**.

# DAY 1

23 MAY 2024

From 8.00 am – **REGISTRATION**

8.30 am to 8.45 am

## OPENING SPEECH

**Dr. Daniel Risch**, Prime Minister of the Principality of Liechtenstein

9.00 am to 10.45 am

## SESSION 1

### OECD Developments affecting Trusts, Foundations and Similar Arrangements and Roundtable with Tax Administrations on current tax audit approaches

#### *Keynote*

**Dr. Achim Pross**, Deputy Director, Centre for Tax Policy and Administration, OECD, France

#### *Chairs*

**Prof. Dr. Vikram Chand**, Professor, Program Director, Executive Program in Transfer Pricing, Tax Policy Center, University of Lausanne, Switzerland

**Dr. Marco Felder**, Partner, Chairman of the Board of Directors, Felder Sprenger + Partner AG, Liechtenstein

**Anna Stark**, Senior Tax Consultant, Felder Sprenger + Partner AG, Liechtenstein

#### *Panelists*

–**Carlos Protto**, Director of International Tax Relations, Argentine Ministry of Economy, Argentina

–**Bernhard Canete**, Head International Division, Fiscal Authority of Liechtenstein

–**Scott McCartney**, Senior Policy Advisor, Tax Treaty Team, UK Competent Authority, United Kingdom

–**Rajat Bansal**, Principal Chief Commissioner of Income Tax (International Tax), Central Board of Direct Taxes, Department of Revenue, Government of India (Retired), India

## COFFEE BREAK – 15 MINUTES

11.00 am to 12.30 pm

## SESSION 2

### Recent updates on Non-Tax developments to Trusts, Foundations and Similar Arrangements

#### *Chair*

**Mukesh Butani**, Founder & Managing Partner BMR Legal, India

#### *Opening presentation*

**Philip Baker**, Field Court Tax Chambers, Visiting Professor, University of Oxford, Faculty of Law, United Kingdom

#### *Papers*

–**Prof. Dr. Andres Báez Moreno**, Senior Researcher, Max Planck Institute for Tax Law and Public Finance, Germany

–**Dr. Marco Felder and Anna Stark**, Felder Sprenger + Partner AG, Liechtenstein

–**Filippo Noseda**, Partner, Mishcon de Reya LLP, London, United Kingdom

#### *Panelists*

–**Dr. Tobias Rohner**, Attorney at Law, Certified Tax Expert, Partner, VISCHER AG, Switzerland

–**Dr. Vladimir Good**, Trust Advisor, Attorney at Law, Präsidial Anstalt, Liechtenstein

## LUNCH BREAK – 60 MINUTES

1.30 pm to 3.00 pm

### SESSION 3

#### Domestic Direct Tax Law updates with a focus on Cross Border Tax Issues

*Chair*

**Dr. Paolo Panico**, Owner, Private Trustees SA, Luxembourg, Deputy Chairman, STEP world-wide

*Papers*

– **Dr. Marcel R. Jung**, Partner, MME Legal Tax Compliance, Switzerland

– **Nathalie Idsinga**, Partner, Arcagna Attorneys, and Lecturer/Researcher, University of Amsterdam, The Netherlands

– **Dr. Mark Brabazon**, Senior Fellow (Melbourne Law Masters), University of Melbourne, Australia

– **Alvaro de la Cueva**, Partner, Garrigues, and Teacher, and Associate Professor, Universidad Autónoma de Madrid, Spain

*Panelists*

– **Paolo Ludovici**, Partner, Gatti Pavesi Bianchi Ludovici, Italy

– **Prof. Dr. Klaus von Brocke**, Tax Lawyer, Kanzlei von Brocke, and Professor, Europa-Institut Saarland University, Germany

### COFFEE BREAK – 30 MINUTES

3.30 pm to 5.30 pm

### SESSION 4

#### The use of Trusts, Foundations and other Similar Arrangements for Philanthropic Purposes

*Chair*

**Prof. Dr. Sigrid Hemels**, Professor of Tax Law, Erasmus School of Law, Erasmus University, Rotterdam and State Councilor, Advisory Division of the Dutch Council of State, The Netherlands

*Papers*

– **Prof. Dr. Søren Friis Hansen**, Professor, Copenhagen Business School, Denmark /

– **Dr. Mark Ørberg**, Professor, Copenhagen Business School, Denmark

– **Prof. Dr. Giedre Lideikyte Huber**, Assistant Professor, University of St. Gallen, Switzerland

– **Dr. Ineke A. Koele**, Partner, Koele Tax & Legal Perspecta, The Netherlands

*Panelists*

– **Dr. Thomas Zwiefelhofer**, President, Association of Liechtenstein Charitable Foundations & Trusts /

– **Ralph Thiede**, Managing Director, Member of Management Board, First Advisory Group, Liechtenstein

– **Julia Kleiser**, Philanthropy Advisor, LGT Private Banking, Switzerland

– **Giulia Cipollini**, Partner, Whittersworldwide, Italy

– **Darshan Chulani**, Private Client & Tax Attorney, Caplin & Drysdale, United States

### APÉRO from 5.30 PM

### SOCIAL PROGRAM from 7.30 PM (only for speakers)

## DAY 2

24 MAY 2024

### 8.30 am – WELCOME / REGISTRATION

8.45 am to 9.15 am

#### OPENING

*Keynote on Application of Tax Treaties to Trusts: History, Evolution and Unresolved Issues*

**Prof. Dr. Robert Danon**, Professor of Law, Director, Tax Policy Center, University of Lausanne/ Founder, DANON, Switzerland

9.15 am to 11.00 am

#### SESSION 5

##### Tax Treaty Issues

*Chair*

**Prof. Dr. Francisco Alfredo García Prats**, Professor of Tax and Financial Law, University of Valencia, Spain

*Papers*

–**Dr. Mario Tenore**, Associate Partner, Pirola Pennuto Zei & Associati, Italy

–**Prof. Dr. Michael McGowan**, Visiting Professor, King's College London, United Kingdom

–**Prof. Stefano Loconte**, Founder and Managing Partner, Loconte & Partners, and Chair of STEP, Italy

–**Dr. Dhruv Janssen-Sanghavi**, Leader International Tax & International Tax Litigation Nishith Desai Associates, Visiting Professor, University of Amsterdam, The Netherlands

*Panelists*

–**Piotr Augustyniak**, Partner, CEO of PATH Family Office, Switzerland

–**Fouad Sayegh**, Partner, Walder Wyss, Geneva, Switzerland

–**Alberto Brazzalotto**, Partner, Maisto e Associati, United Kingdom

### COFFEE BREAK – 15 MINUTES

11.15 am to 12.45 pm

#### SESSION 6

##### EU Tax Law Implications

*Chair*

**Prof. Dr. Marco Allenà**, Professor of Tax Law, University Cattolica del Sacro Cuore, Piacenza, and Partner, Advest Tax Legal Corporate, Milan, Italy

**Prof. Dr. Adam Zalasinski**, Senior Legal Officer, EU commission, Brussels, Belgium

*Papers*

–**Prof. Dr. Rita Szudoczky**, Associate Professor, WU Vienna, Austria / **Prof. Moritz Scherleitner**, Associate Professor, Aalto University Helsinki, Finland

–**Prof. Dr. Paolo Arginelli**, Partner, Pirola Pennuto Zei & Associati, and Tax Law Professor, Università Cattolica del Sacro Cuore di Piacenza, Italy

–**Umberto Volonté**, Partner, Advest Tax Legal Corporate, Milan, Italy

–**Dr. Alessandro Turina**, Principal Associate, IBFD, The Netherlands

–**Prof. Dr. Jean-Philippe Van West**, Professor International and European Tax Law, Vrije University of Brussel, and Senior Counsel, PwC, Belgium

*Panelists*

–**Dr. Massimo Antonini**, Partner, Member of the Strategic Committee, Chiomenti, Italy

–**Filippo Noseda**, Partner, Mishcon de Reya LLP, London, United Kingdom

### LUNCH BREAK – 60 MINUTES

1.45 pm to 3.15 pm

## SESSION 7 Specific Challenges Wealth, Inheritance and Transactions Taxes

*Chair*

**Prof. Dr. Martin Wenz**, Professor of International and Liechtenstein Tax Law, University of Liechtenstein, Vaduz, Liechtenstein

*Papers*

- **Prof. Dr. Violeta Ruiz Almendral**, Associate Professor, University Carlos III, Madrid, Spain
- **Francesco Avella**, Partner, Studio Avella e Associati, Member of the Editorial Board of European Taxation (IBFD), Italy
- **Prof. Dr. Peter Hongler**, Professor of Tax Law, University St. Gallen, Switzerland
- **Prof. Dr. Karoline Spies**, Professor, WU Vienna, and Senior Tax Manager, Deloitte, Austria / **Dominic Krenn**, Freshfields Research Project Associate, WU Vienna, Austria

*Panelists*

- **Dr. Céline Martin**, Partner, Riedweg & Partner, Switzerland
- **Dr. Oliver Klein**, CEO, Managing Director, Bartsch Tax, Germany

**COFFEE BREAK – 15 MINUTES**

3.30 pm to 5.00 pm

## SESSION 8 Impact of Pillar II and Transfer Pricing Rules

*Chair*

**Prof. Dr. Tommaso Di Tanno**, Founder Partner of Di Tanno Associati, Italy

**Prof. Dr. Raoul Stocker**, Partner, Bär & Karrer, and Professor, ILE-HSG Institut für Law & Economics, Switzerland

*Papers*

- **Kinga Romanovska**, Research Associate, Tax Policy Center, University of Lausanne, Switzerland
- **Prof. Dr. Leopoldo Parada**, Associate Professor in Tax Law, University of Leeds, United Kingdom
- **Amanda Pletz**, Director, NERA Economic Consulting, United Kingdom

*Panelists*

- **Jan Roderick van Abbe**, Partner, Deloitte Dubai, United Arab Emirates
- **David Farath**, Partner at Skadden, Arps, Slate, Meagher & Flom LLP, United States
- **Prof. Dr. Stefano Grilli**, University of Milan Bicocca, Partner, Deloitte, Italy

**APÉRO from 5.00 PM**

**SOCIAL PROGRAM from 6.30 PM**  
(only for speakers)

The conference is supported by  
the following universities



The book publisher

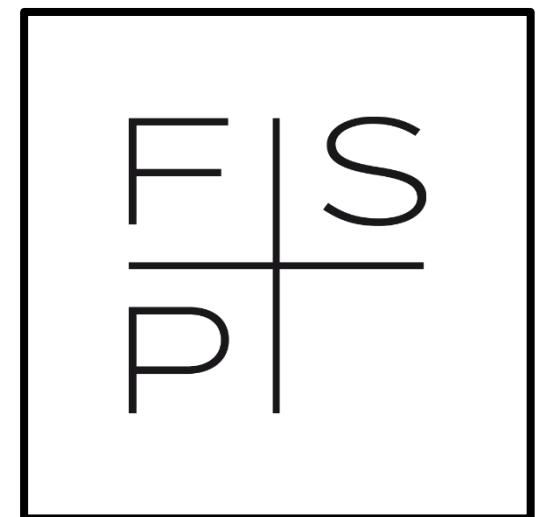


---

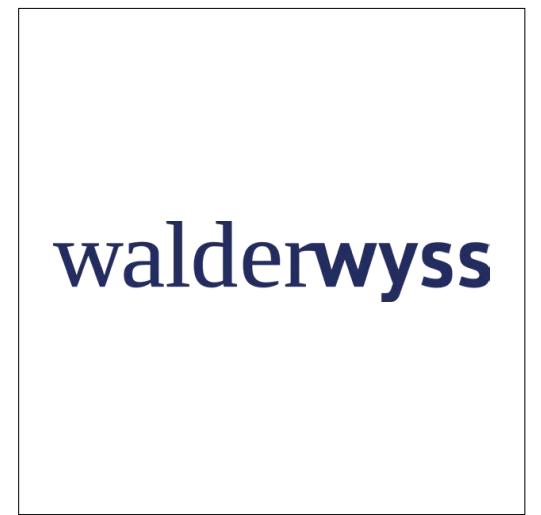
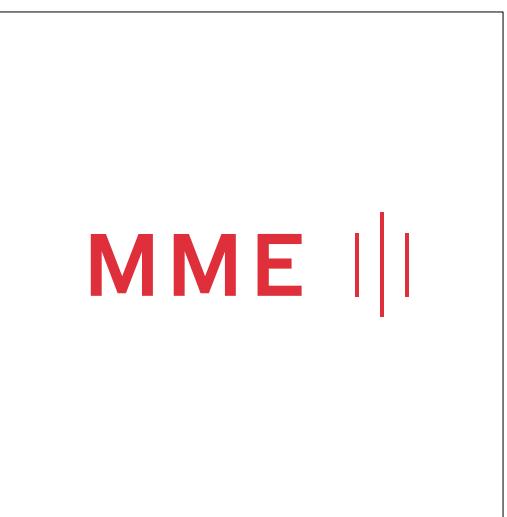
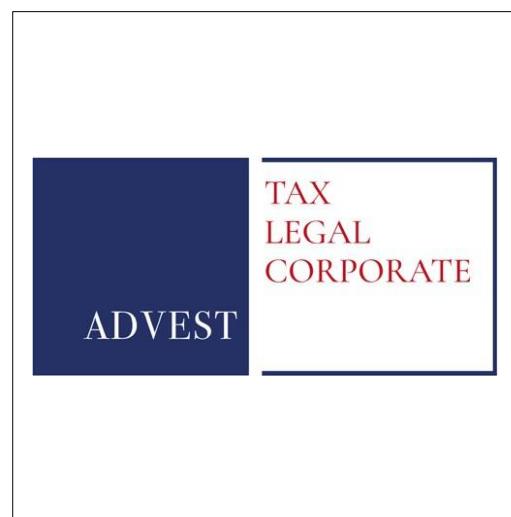
The event is sponsored by the following private organizations



*Main Sponsor*

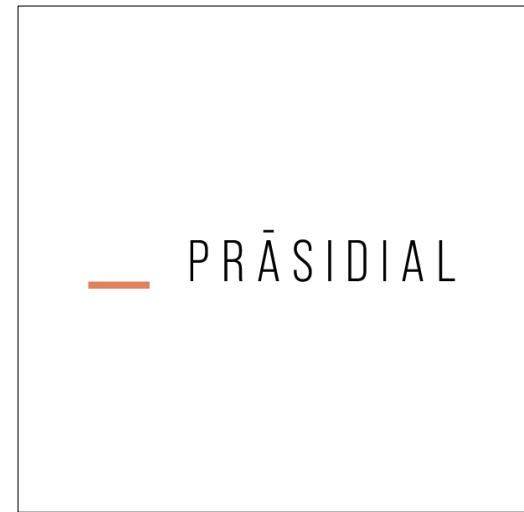
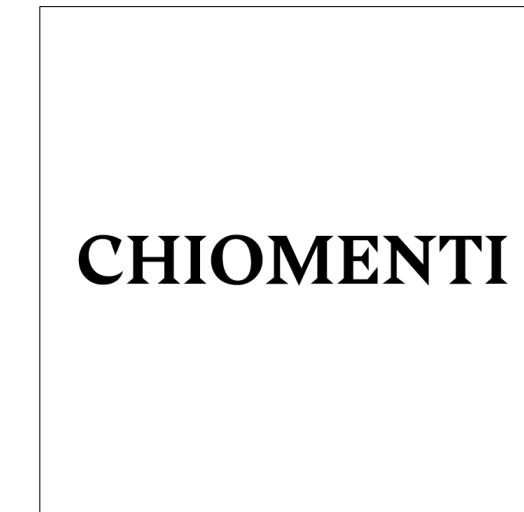


*Co-Organizer*



---

The event is sponsored by the following private organizations



## CONTACT

### ITLRN Founders

**Prof. Dr. Vikram Chand**

University of Lausanne  
vikram.chand@unil.ch

**Prof. Dr. Svetislav V. Kostic**

University of Belgrade  
skostic@ius.bg.ac.rs

**Prof. Dr. Andrés Baez Moreno**

Max Planck Institute  
andres.baez@tax.mpg.de

**Dr. Mario Tenore**

Pirola Pennuto Zei & Associati  
mario.tenore@studiopirola.com

### Local ITLR Members and Co-Organizers

**Dr. Marco Felder**

Felder Sprenger + Partner AG  
marco.felder@fsp.li

**Anna Stark**

Felder Sprenger + Partner AG  
anna.stark@fsp.li

## REGISTRATION

Registration for the conference:

<https://itlrnregistration.fsp.li/>

**Price (participation in person or online):**  
EUR 480.00\* for two days; EUR 320.00 for one day.

\* a reduced fee of EUR 280.00 applies to full time academics / doctoral candidates

*The price is per person and exclusive of VAT. Lunches and aperitifs are included in the price of the conference ticket.*

*The event is supported by several universities as well as private banks, law firms, consulting firms as well as various fiduciaries.*

# LGT – the competent partner for trustees and lawyers

| Forward-looking  
for generations



**Private  
Banking**