



INSTITUTE OF INTERNATIONAL BANKERS

ANNUAL SEMINAR ON U.S. TAXATION OF INTERNATIONAL BANKS

June 11, 2018

Offices of Skadden, Arps, Slate, Meagher & Flom LLP
4 Times Square

8:30 – 8:55 a.m. *Continental Breakfast*

8:55 – 9:00 a.m. **Welcome** **Briget Polichene, CEO**
Institute of International Bankers

9:00 – 10:15 a.m. **The BEAT: Tuning Your Operations to Comply**
There are many questions surrounding the BEAT, but also a certainty, foreign banks will need to be prepared. Panelist will address questions on the BEAT and what firms should be doing now.

Robert Shapiro
(moderator)

Head of Tax-Americas
Societe Generale

Jack Burns

Executive Director
EY

David Hariton

Partner
Sullivan and Cromwell

Erika Nijenhuis

Partner
Cleary Gottlieb Steen & Hamilton LLP

Danny Simon

Partner
PwC

10:15 – 10:30 a.m. *Coffee Break*

10:30 – 11:20 a.m. **In Conversation: Insights on Implementation of the New Tax Law**

Dana Trier

Counsel
Davis Polk & Wardwell LLP
*former Deputy Assistant Treasury Secretary
for Tax Policy.*

With

Paul Oosterhuis

Of Counsel
Skadden, Arps, Slate, Meagher & Flom LLP



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11:20 – 12:15 p.m.

Beyond Tax Reform – Updates on other Federal Tax Efforts

While tax reform continues to be the main topic for many in the tax world, Sections 871(m), 385 and 305(c) have not gone away. Panelists will update the group on the status of these regulations, and other items to keep in mind.

Michael Brown
(moderator)

Head of U.S. Tax
TD Bank Group

Lucy Farr

Partner
Davis Polk & Wardwell LLP

Tara Ferris

Principal
EY

Mark Leeds

Partner
Mayer Brown LLP

12:15 – 1:15 p.m.

Networking Luncheon

1:15 – 2:15 p.m.

State and Local Tax Issues and the Impact of Tax Reform

Our annual review of some of the more recent state and local tax law changes, including in New York. With the addition of federal tax reform, panelists will also discuss how new federal rules might potentially affect firms' tax filings in various states.

Habibe (Bibi) Rubio
(moderator)

Head of U.S. Tax/Finance
Westpac Banking Corporation

Alysse McLoughlin

Partner
McDermott Will & Emery LLP

Rob Michaelis

Partner
Grant Thornton LLP

Fred James

Partner
KPMG

2:15 – 2:30 p.m.

Coffee Break



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2:30 – 3:30 p.m.

The Future of Transfer Pricing

The OECD-BEPS, the BEAT, recent court cases, automation – what does it all mean with respect to transfer pricing? This panel will review recent developments and the potential impact on transfer pricing requirements.

Beatrice Montaudy
(moderator)

Director
Barclays

John Breen

Partner
Skadden, Arps, Slate, Meagher & Flom LLP

Frank Douglas

Principal
PwC

Joseph Tobin

Principal
Deloitte

3:30 – 4:30 p.m.

Looking Ahead: Potential Regulatory Changes Affecting Tax Departments

Recent financial services regulations, including capital rules, have had an impact on the responsibilities of tax departments. A panel of experts will discuss some potential regulatory changes and what that means for foreign banks and their tax strategies.

Todd Voss

Partner
KPMG

David Wright

Managing Director
Deloitte

Other private-sector experts have also been invited