



IFA /

International Fiscal Association

**RENCONTRE DES GROUPEMENTS
FRANÇAIS BELGE & LUXEMBOURGEOIS**

Vendredi 3 et Samedi 4 juin 2016 à Nice

SCIENTIFIC PROGRAM

FRIDAY 3 JUNE 2016

12h *Reception of participants*

12h30/14h *Lunch*

14h/16h Session 1: The implementation of « anti-BEPS » measures in the 3 countries: context and perspective

Chair: Philippe Durand, PwC France

Bruno Gibert, CMS Bureau Francis Lefebvre, France

Caroline Docclo, Loyens & Loeff, Belgium

François Guilloteau, Deloitte Tax & Consulting, Luxembourg

16h/16h30 *Pause-café*

16h30/17h30 Session 2: The tax treatment of hybrid instruments

Chair: Frank Muntendam, EY, Luxembourg

Siamak Mostafavi, Jones Day, France

Charles-Albert Helleputte, Mayer Brown, Belgium

Olivier Van Ermengem, Linklaters LLP, Luxembourg

17h30/19h Session 3: The new EU anti-abuse clauses in the Parent Subsidiary Directive and proposed ATA Directive

Chair: Thierry Denayer, Stibbe, Belgium

Pascal Faes, NautaDutilh, Belgium

Gauthier Blanluet, Sullivan & Cromwell, France

Alain Goebel, Arendt & Medernach, Luxembourg

20h15 *Dinner at the « Beau Rivage » Restaurant in Nice*

SATURDAY 4 JUNE 2016

9h/10h30 Session 4: The elimination of double taxation on cross-border investment income (withholding tax and tax credit); the impact of EU Law

Chair: Philippe Derouin, Cabinet Derouin, France

Philippe Vanclooster, PwC, Belgium

Gerdy Roose, BDO Luxembourg

10h30/11h *Coffee break*

11h/12h30 Session 5: Fundamental rights in tax matters: some remarkable examples in our domestic, judicial, administrative and legislative practice

Chair: Daniel Garabedian, Liedekerke, Belgium

Eric Ginter, Hoche Société d'Avocats, France

Georges Simon, Loyens & Loeff, Luxembourg

12h30/14h *Luncheon Cocktail*