

The new international tax landscape and its impact in Luxembourg

UEL Conference with the support
of the Chamber of Commerce

AGENDA

Welcome addresses

Michel Reckinger, UEL President

Luc Frieden, President of the Luxembourg Chamber of Commerce and Eurochambres

Opening speeches

Yuriko Backes, Finance Minister

Pascal Saint-Amans, Director of the Center for Tax Policy and Administration at the OECD

Panel 1

The future of international taxation – impact for MNEs

Panel 2

The future of international taxation – challenges and opportunities for Luxembourg and other small economies

Closing remarks

Carlo Thelen, Director General at Luxembourg Chamber of Commerce



Yuriko Backes joined the coalition government on 5 January 2022.

Yuriko Backes began her professional career in 1994 at the Ministry of Foreign Affairs and has held various positions, including at the Permanent Representation of Luxembourg to the United Nations in New York, the Permanent Representation of Luxembourg to the Western European Union in Brussels, and the Luxembourg Embassy in Japan.

As attaché at the Directorate of European Affairs and International Economic Relations of the Ministry of Foreign Affairs in Luxembourg, she was sworn in as a civil servant in 2001.

The career diplomat was then assigned to the Permanent Representation of Luxembourg to the European Union in Brussels from 2001 to 2006.

She continued her diplomatic career as deputy head of mission at the Luxembourg Embassy in Japan from 2006 to 2008 and as deputy head of the Directorate for International Economic Relations at the Ministry of Foreign Affairs in Luxembourg from 2008 to 2010.

From 2010 to 2016, Yuriko Backes was the diplomatic adviser and sherpa to Luxembourg Prime Ministers Jean-Claude Juncker and Xavier Bettel.

She was the representative of the European Commission in Luxembourg from 2016 to 2020.

From June 2020 until her appointment to the government, she served as marshal of the Grand-Ducal Court.

PASCAL SAINT-AMANS



Pascal Saint-Amans took on his duties as Director of the Center for Tax Policy and Administration at the OECD on 1 February 2012.

He joined the OECD in September 2007 as Head of the International Co-operation and Tax Competition Division in the CTPA.

He played a key role in the advancement of the OECD tax transparency agenda in the context of the G20. In October 2009 he was appointed Head of the Global Forum Division, created to service the Global Forum on Transparency and Exchange of Information for Tax Purposes, a programme with the participation of over 100 countries.

Pascal Saint-Amans graduated from the National School of Administration (ENA) in 1996, and was an official in the French Ministry for Finance for nearly a decade. He held various positions within the Treasury, including heading the supervision of the EU work on direct taxes and overseeing legislation and policy on wealth tax and mergers and spin offs. He was also the head of tax treaty negotiations and mutual agreement procedures. In this capacity, he participated in the OECD Working Party No. 1 of the Committee on Fiscal Affairs as the delegate for France before being elected Chair of WP1 in 2005.

He was also a member of the UN Group of Experts on International Co-operation in Tax Matters, becoming a “rapporteur” in 2006. Before leaving government service, he was Deputy Director in charge of litigation at the Direction Générale des Impôts.



Panel 1
The future of
international taxation –
impact for MNEs

Moderator: Flora Castellani



Georg is Director of the Global tax Policy of the Group Siemens in Germany since 2007.

Before his career at Siemens, Gebert dealt with various tax issues at the Federation of German Industries in Berlin and Brussels.

Georg is a member of BusinessEurope's tax policy working group and a member of the Tax Committee of Business@OECD.



Bernard joined Deloitte in November 1999 in the International Tax Corporate Department. He has over 20 years of experience in International Tax. After having lead the international tax group with success for almost a decade, he took over the leadership of Deloitte Luxembourg Tax Department counting more than 500 tax professionals as Head of Tax.

He advises companies on tax structuring & tax modelling. He also counsels clients active in divesting and acquiring cross-jurisdiction targets as well as restructuring initiatives to align treasury, tax and legal entity structures. He has extensive experience in transactions involving management buy-out, procurement structures, high-value assets and creditor/investor restrictions and Intellectual Property.

Bernard served on the Luxembourg tax desk in the New York office of Deloitte Tax LLP as part of the International Core of Excellence on a two-year assignment. He has extensive experience in assisting U.S. companies to successfully plan, develop and implement tax efficient strategies for their worldwide operations.



Catherine is Head of Tax Department managing tax teams in charge of Corporate Tax, VAT and products/clients tax related matters for the Bank Société Générale and the group entities in Luxembourg.

With more than 20 years of experience in the field of Corporate Tax and VAT matters regarding banks and the financial sector, in Luxembourg and EU Tax Law for individuals, as well as in issues related to exchange of information for tax purposes.

Long-term member of the ABL Fiscal Affairs Committee, as a member of several Working Groups since more than 15 years and as chairman for the last 3 years.



Keith is a founding Partner and the Managing Partner of ATOZ.

A tax professional since 1988, Keith has experience in advising international groups on the design and implementation of global tax strategies. He is/has been actively involved in several key tax international bodies including the OECD's collective investment vehicle ICG and the TRACE BAG.

Keith is the chairman of the Luxembourg chapter of IFA, the Chair of ALFI Tax Commission, the Chair of the INREV Tax Committee and member of other Luxembourg advisory and industry bodies. Keith is also board member and Real Estate Head of Taxand.

Keith is a regular author and speaker at professional and academic conferences. He studied Law then qualified as a Tax Adviser and as a Chartered Accountant in Ireland and Luxembourg, and has completed numerous post-qualification continuing education programmes.



Ioan is currently the Global Indirect Tax Manager in Goodyear, while also retaining direct tax responsibilities for several EMEA countries, including Luxembourg. He is a well-rounded tax professional with 18 years of comprehensive experience in both direct and indirect taxes.

He spent the first 8 years of his career in EY and then PwC while in the past 10 years, since he joined Goodyear, he activates in the industry.

He worked in 4 European countries having the opportunity to experience very different local tax environments from up-close.

Ioan holds a bachelor degree in Accounting and Management Information Systems and two master degrees in Auditing concepts and practices at national and international level from the Academy of Economic Studies and in Security and National Defense from the National Defense University.

He is also a certified Project Management Professional.



Panel 2
The future of
international taxation –
challenges and
opportunities for
Luxembourg and other
small economies

Moderator: Jean-Paul Olinger



Benjamin Angel has been working for the European Commission since 1994.

He is currently Director for the DG TaxUD at EU Commission where he is in charge of a number of sensitive policy issues related to direct taxation, such as non cooperative jurisdictions and tax havens, tax avoidance and tax evasion, business taxation (including taxation of the digital sector) and tax cooperation between Member States (including the code of conduct).

He is also in charge of the infringement procedures and of the economic analysis in these fields.



Emil Stavrev has been at the International Monetary Fund (IMF) for over 20 years where he has worked on several advanced and emerging economies, including the euro area and Russia. Mr. Stavrev is currently a Deputy Division chief at the IMF's European Department where he leads missions to Luxembourg and Norway. Prior to joining the European Department, he was a Deputy Division Chief at the IMF's Research Department where he co-managed work on the G-20 economies and global economic spillovers. In this position Mr. Stavrev led several missions to the G-20 meetings, covering issues related to global imbalances and G-20 Mutual Assessment Process.

Prior to joining the Fund, he worked in the Monetary Department of the Czech National Bank. Mr. Stavrev holds a PhD in Economics from the Center for Economic Research and Graduate Education in Prague.



Carlo Fassbinder is now for almost 5 years the Director for taxation at the ministry of Finance in Luxembourg.

Before, Carlo held for 20 years various functions in the field of taxation in a major international bank in Luxembourg.

By education, he holds a degree in management from HEC Lausanne, a master in law from University Robert Schuman in Strasbourg and an LLM from the University of Munich



Since June 2015, Werner Haslehner has been Full Professor and the holder of the ATOZ Chair for European and International Taxation at the University of Luxembourg, where he is also the Course Director for the Master in European and International Taxation LL.M. programme.

Werner specialises in international tax law, tax policy and European law, frequently publishing and lecturing on these topics in and outside Europe.

He is also interested in the integration of economic and legal research, and holds a Master's degree in business and economics in addition to his legal education.

His PhD thesis concerned the international and European law framework for the non-discrimination of permanent establishments and was published by Linde in 2009. The thesis received several academic prizes, most notably the European Academic Tax Thesis Award, by the European Association of Tax Law Professors jointly with the EU Commission.

NATALIA RADICHEVSKAIA



Natalia Radichevskaia is a lawyer by education specialised in EU law and with expertise in tax matters, financial services and economic governance.

She started her professional career as a legal adviser in the trading room of Banque Générale du Luxembourg, which she left for the Commission de Surveillance du Secteur financier to work as a legal counsellor in securitisation, venture capital and pension funds unit.

In 2008, she joined the European Commission as a seconded national expert in DG Internal Market in corporate governance and anti-money laundering unit, where she stayed until 2012.

From then on, she moved to Luxembourg Permanent Representation in the EU as financial counsellor in charge of taxation, financial services and economic affairs, and from 2018 to the Representation of Luxembourg at the OECD in Paris, as financial counsellor in charge of taxation, economic affairs and budget. She is representing Luxembourg in the technical negotiations of the OECD international tax reform.