Welcome BBQ Hosted by The BDA

19:30 - 21:30

Main agenda
## Schedule

**Welcome BBQ Hosted by The BDA** - 03/05/2017

<table>
<thead>
<tr>
<th>Time</th>
<th>Main Agenda</th>
</tr>
</thead>
<tbody>
<tr>
<td>19:00</td>
<td>19:30 - Welcome BBQ Hosted by The BDA</td>
</tr>
</tbody>
</table>

**Transcontinental Trusts: International Forum 2017**

- **4-5 May 2017**
- The Fairmont Southampton
- Bermuda

[finance.knect365.com/transcontinental-trusts-international-forum/](finance.knect365.com/transcontinental-trusts-international-forum/)
Welcome BBQ Hosted by The BDA at 7.30pm on the Great Lawn, The Fairmont Southampton on Wednesday 3rd May
00:00 - 20:00
Main agenda

Registration
08:00 - 08:30
Main agenda

The Demise of Traditional Philanthropy: Breaking down the Walls Between The Non-Profit and For-Profit Sectors
08:30 - 09:10
Breakfast Briefing - Room 1

Today's philanthropy is moving beyond traditional notions of charity at an unprecedented scale in an effort to tackle social and environmental issues. Faced with increasing domestic and international regulation coupled with the demand for demonstrated impact and sustainability, more and more donors are turning toward for-profit structures and practices to guide and facilitate their investments. No longer mutually exclusive worlds, Gina Pereira and Ed Granski will explore the convergence of for-profit and non-profit organisations to effect change in society as demonstrated by the use of:

i. for-profit vehicles to facilitate social investment such as the work undertaken by Mark Zuckerberg;
ii. philanthropic capital to launch social enterprises;
iii. hybrid revenue generation models by operating charities to achieve greater sustainability; and
iv. programme related investments by US private foundations and their immense potential in the social enterprise arena.

Participants
Gina Pereira - Founder, Dāna Philanthropy
Edmund Granski - Senior Advisor, Meritus Trust Company

How to Hold Property
08:30 - 09:10
Breakfast Briefing - Room 2

- Buying property - what are the issues for trustees and how to overcome them
- If you are acting for a overseas investor how would you hold the property?
- How do different jurisdictions deal with real estate
- Trading companies, speculative or risky investments, trophy assets and wasting assets
- Suitable structures
- Tax considerations

Participants
Robert Brodrick - Partner, Payne Hicks Beach
Roderick Balfour - Co-Founder, Virtus Trust
Randall Krebs - Director, Harbour International Trust Company Limited

Bartlett revisited
08:30 - 09:10
Breakfast Briefing - Room 3

Revisiting Bartlett in the light of the Gestrust case. How do proactive trustees differentiate themselves today. Looking at the legal and practical issues when trustees want to flex their muscles. A formal presentation and role play.

Participants
Jeremy Kosky - Partner, Clifford Chance LLP
Simon Graham - Group Managing Director, Lancaster
Marie McNeela - Director, Lancaster

The Asian approach to Trusts
08:30 - 09:10
Breakfast Briefing - Room 4

A discussion of the cultural differences to be aware of when dealing with Asian clients and their approach to choosing their advisors as well as towards Trusts. Discussion will include a focus around the reluctance to talk about death, reluctance to hand over control, and also the difficulty of getting close enough for the client’s to trust you.

Participants
Catriona Syed - Partner, Charles Russell Speechlys
Richard Norridge - Head of Private Wealth and Trusts, Herbert Smith Freehills

International Trust Litigation Update
11:00 - 11:50
Main agenda

Participants
Nicholas Le Poidevin QC - Barrister, New Square Chambers
Robert Ham QC - Barrister, Wilberforce Chambers
Jonathan Speck - Managing Partner, Mourant Ozannes

Opening Welcome from the Government of Bermuda
09:50 - 10:00
Main agenda

Participants
The Hon. Michael Dunkley - Premier, The Government of Bermuda
Ross Webber - Chief Executive officer, BDA

Keynote Address: Economic & Political Update Including the Impact of Brexit and the US Election Update
10:00 - 10:40
Main agenda

Participants
Daniel Silke, Political Analyst

Refreshment Break
10:40 - 11:00
Main agenda

Chairmen's Opening Remarks & History of the America's Cup
09:30 - 09:50
Main agenda

Participants
Mr Jonathan Conder - Partner, Macfarlanes
Basil Zirinis - Partner, Sullivan & Cromwell LLP
LATAM - Discussion of the Tax Amnesty
11:50 - 12:30
Main agenda
• amnesties: are they successful?
• loss of privacy: how will clients react?
• tightening tax systems – potential developments
• moving to the U.S.: panacea or trap

Participants
Moderator: Robert Reymond - Partner, Stikeman Elliott
Hal Webb - Partner, Bilzin Sumberg
Jose Chiarella - Partner, Garrigues
Martin Litwak - Partner, Litwak & Partners
Alessandro Amadeu da Fonseca - Partner, Mattos Filho, Veiga Filho, Marrey Jr e Quiroga Advogados

Lunch
12:30 - 13:30
Main agenda

Practical Consequences of CRS & FATCA: TIEAs, Disclosures & Amnesty Program
13:30 - 14:20
Main agenda
• Technical issues arising in connection with the new rules (e.g. classification of protectors, appointors, enforcers, PTCs)
• Privacy and data protection implications of the new transparency rules.
• How families are approaching the increased level of transparency and whether the new rules are leading to change in attitudes/governance/internal communication.

Participants
Moderator: Mary Duke - Family Wealth Advisor
Filippo Noseda - Partner, Withers
John Riches - Partner, RMW Law

Extracting Information from Trusts
14:20 - 15:00
Main agenda
This lively session will take the form of a trustee posing a number of tricky questions to legal advisors who will be under the spot to provide advice concerning various information requests. Topics covered will include protector consent, on-shore data protection laws, automatic reporting and TIEA orders as well as divorce within the family.

Participants
Elspeth Talbot - Rice QC - Barrister, XXIV Old Buildings
Paul Hodgson - Managing Director, Butterfield Trust (Guernsey) Limited
Moderator: Keith Robinson - Partner, Appleby

Refreshment Break
15:00 - 15:20
Main agenda

Designer Legislation
15:20 - 16:00
Main agenda
• Hastings Bass/mistake and the new offshore statutory frameworks post-Pitt v Holt/Futter v Futter
• Reserved powers
• Specialist trusts created by statute (including STAR and VISTA trusts)
• The US perspective on designer legislation
• Practical hints and tips for those setting up or litigating structures that take advantage of these provisions

Participants
Moderator: Vanessa Schrum - Group Head of the Private Client and Trusts Department, Appleby
Jonathan Arr - Partner, Macfarlanes
Peter Pearman - Director, Conyers Dill & Pearman

Family Governance
16:00 - 16:40
Main agenda

Participants
Mary Duke - Family Wealth Advisor
Mr Joseph Field - Of Counsel, Withers Bergman LLP
Nicholas Jacob - Partner, Forsters
Michael Farrant - Partner, Project Associates

Chairmen's Summation
16:40 - 16:50
Main agenda

Participants
Mr Jonathan Conder - Partner, Macfarlanes
Basil Zirinis - Partner, Sullivan & Cromwell LLP

Beach Party Hosted by Meritus Trust
18:30 - 20:30
Main agenda
Please note this will be on the beach so please wear appropriate footwear.

Participants
Introduced by: Michelle Wolfe - Partner, Meritus Trust Company

Dinner on the Beach
20:30 - 22:00
Main agenda

For Rising Star Entrants only

Rising Stars Drinks Reception (for Rising Stars only - everyone else may change prior to the beach party)
17:00 - 18:00
Main agenda

For Rising Star Entrants only
<table>
<thead>
<tr>
<th>TIME</th>
<th>MAIN AGENDA</th>
<th>BREAKFAST BRIEFING - ROOM 1</th>
<th>BREAKFAST BRIEFING - ROOM 2</th>
<th>BREAKFAST BRIEFING - ROOM 3</th>
<th>BREAKFAST BRIEFING - ROOM 4</th>
</tr>
</thead>
<tbody>
<tr>
<td>00:00</td>
<td>00:00 - Welcome BBQ Hosted by The BDA at 7.30pm on the Great Lawn, The Fairmont Southampton on Wednesday 3rd May</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>01:00</td>
<td>01:00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>02:00</td>
<td>02:00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>03:00</td>
<td>03:00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>04:00</td>
<td>04:00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>05:00</td>
<td>05:00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>06:00</td>
<td>06:00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>07:00</td>
<td>07:00</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>08:00</td>
<td>08:00 - Registration</td>
<td>08:30 - The Demise of Traditional Philanthropy: Breaking down the Walls Between The Non-Profit and For-Profit Sectors</td>
<td>08:30 - How to Hold Property</td>
<td>08:30 - Bartlett revisited</td>
<td>08:30 - The Asian approach to Trusts</td>
</tr>
<tr>
<td>09:00</td>
<td>09:30 - Chairmen's Opening Remarks &amp; History of the America's Cup</td>
<td>09:50 - Opening Welcome from the Government of Bermuda</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TIME</td>
<td>MAIN AGENDA</td>
<td>BREAKFAST BRIEFING - ROOM 1</td>
<td>BREAKFAST BRIEFING - ROOM 2</td>
<td>BREAKFAST BRIEFING - ROOM 3</td>
<td>BREAKFAST BRIEFING - ROOM 4</td>
</tr>
<tr>
<td>-------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>10:00</td>
<td>10:00 - Keynote Address: Economic &amp; Political Update Including the Impact of Brexit and the US Election Update</td>
<td>10:00 - Keynote Address: Economic &amp; Political Update Including the Impact of Brexit and the US Election Update</td>
<td>10:00 - Keynote Address: Economic &amp; Political Update Including the Impact of Brexit and the US Election Update</td>
<td>10:00 - Keynote Address: Economic &amp; Political Update Including the Impact of Brexit and the US Election Update</td>
<td>10:00 - Keynote Address: Economic &amp; Political Update Including the Impact of Brexit and the US Election Update</td>
</tr>
<tr>
<td>10:40</td>
<td>10:40 - Refreshment Break</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11:00</td>
<td>11:00 - International Trust Litigation Update</td>
<td>11:00 - International Trust Litigation Update</td>
<td>11:00 - International Trust Litigation Update</td>
<td>11:00 - International Trust Litigation Update</td>
<td>11:00 - International Trust Litigation Update</td>
</tr>
<tr>
<td></td>
<td>11:50 - LATAM - Discussion of the Tax Amnesty</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12:00</td>
<td>12:30 - Lunch</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13:00</td>
<td>13:30 - Practical Consequences of CRS &amp; FATCA: TIEAs, Disclosures &amp; Amnesty Program</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14:00</td>
<td>14:20 - Extracting Information from Trusts</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15:00</td>
<td>15:00 - Refreshment Break</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15:20</td>
<td>15:20 - Designer Legislation</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16:00</td>
<td>16:00 - Family Governance</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16:40</td>
<td>16:40 - Chairman's Summation</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17:00</td>
<td>17:00 - Rising Stars Drinks Reception (for Rising Stars only - everyone else may change prior to the beach party)</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18:00</td>
<td>18:30 - Beach Party Hosted by Meritus Trust</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19:00</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TIME</td>
<td>MAIN AGENDA</td>
<td>BREAKFAST BRIEFING - ROOM 1</td>
<td>BREAKFAST BRIEFING - ROOM 2</td>
<td>BREAKFAST BRIEFING - ROOM 3</td>
<td>BREAKFAST BRIEFING - ROOM 4</td>
</tr>
<tr>
<td>-------</td>
<td>---------------------------------</td>
<td>-----------------------------</td>
<td>-----------------------------</td>
<td>-----------------------------</td>
<td>-----------------------------</td>
</tr>
<tr>
<td>20:00</td>
<td>20:30 - Dinner on the Beach</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
**Matrimonial Property Regimes**

08:30 - 09:10
Breakfast Briefing - Room 1

- New EU Regulation on jurisdiction, applicable law and enforcement in matters of matrimonial property regimes
- Brexit’s impact on divorce capital London: less attractive for cases with assets in EU? Larger magnet for cases with offshore ties?
- Latest judgments round-up

**Participants**

David Wilson - Partner, Schellenberg Wittmer Ltd
Alison Hayes - Partner, Levison Meltzer Pigott Family Office

08:30 - 09:10
Breakfast Briefing - Room 2

**Participants**

Patricia Woo - Of Counsel, Squire Patton Boggs
Valerie Wu - Partner, Pinsent Masons

**The Pressures on Offshore Jurisdictions**

08:30 - 09:10
Breakfast Briefing - Room 3

**CRS**

FATCA

Public registers of ownership

Onshore tax reform

Public relations problem

**Participants**

Dianne Mehany - Partner, Caplin & Drysdale
Mr. Nicholas Holland - Partner, McDermott Will & Emery
Jim Edmondson - Mourant Ozannes, Mourant Ozannes
Andrew Needham - Deputy Managing Director, Sackville Bank and Trust Company Limited

**To Trust or not to Trust – When Trustees Turn Bad**

08:30 - 09:10
Breakfast Briefing - Room 4

- Trustees are fiduciaries and therefore beneficiaries and settlors expect to be able to trust them. This give rogue trustees a head start when committing fraud
- Many trusts center on tax efficiency issues. This can sometimes involve component parts of the trust being set up in somewhat less established and less regulated jurisdictions.
- Privacy/confidentiality is a two edged sword. Settlers and beneficiaries may want it, but when things go bad it can cause problems.
- Will victim beneficiaries/cheated settlors be willing to avail themselves of public law remedies?
- If rogue trustees control trust assets and have apparent rights of indemnity against the trust a beneficiary/settlor victim can suffer serious depletion of trust assets which are used to resist his attempts to frustrate the rogue trustee.

Ascertaining rogue trustee assets before commencing action can be important, if this depletion is to have chance of being remedied, upon ultimate victory.

- Most large trusts are, to some extent, involved in jurisdictional, tax and regulatory arbitrage. This can preserves assets but poses its own difficulties when mounting an asset recovery effort. Project managing/leading such an effort especially given the above is a challenge in itself.

**Participants**

Dan Wise - Head of Litigation, Martin Kenney & Co Solicitors
Christian Hay - Partner, Collas Crill
Natasha Kapp - Partner, Carey Olsen
Thomas Fletcher - Barrister, New Square Chambers

**Chairman’s Opening Remarks**

09:30 - 09:40
Main agenda

**Participants**

Mr. Jonathan Conder - Partner, Macfarlanes
Basil Zirinis - Partner, Sullivan & Cromwell LLP

**Trans Trusts International Supreme Court**

09:40 - 10:50
Main agenda

**Participants**

Gilead Cooper QC - Barrister, Wilberforce Chambers
Shân Warnock-Smith QC - Barrister, ICT Chambers

In front of: The Honourable Justice David Hayton, The Caribbean Court of Justice

Her Honour Hazel Marshall QC - Lieutenant Bailiff, States of Guernsey
The Hon. Geoffrey Bell, Bermuda

Justice Robin McMillan, Cayman

**What impact does the anti-establishment/anti-globalisation political trends in the west have on the clients we look after?**

10:50 - 11:30
Main agenda

- Are UHNWs concerned?
- Where might this lead?
- Might these trends create opportunities?
- What might the impact be on the products and services we provide?

**Participants**

Mr Jeremy Franks - CEO - Private Clients, Knox Private Office
Gary Heynes - Partner, UK Head of Private Client and Family Wealth, RSM Tax and Advisory Services LLP
Mr Jonathan Burt - Partner, Harcus Sinclair

**Refreshment Break**

11:30 - 11:50
Main agenda

**Chair’s Opening**

11:50 - 11:55
Stream 1 - EU

**Participants**

Arabella Murphy - Partner, Maurice Turnor Gardner

**UK Non Dom Tax Changes: What Do We Do Now?**

11:55 - 12:35
Stream 1 - EU

**Participants**

Mr Jonathan Burt - Partner, Harcus Sinclair
Xavier Nicholas - Partner, Forsters
Glen Atchison - Managing Partner, Harbottle & Lewis

finance.knect365.com/transcontinental-trusts-international-forum/
EU session - Panel of French, Italian, Spain and UK (Planning Update) Tax Competition & Mobility in Europe
12:35 - 13:15
Stream 1 - EU
Participants
Ms Beatrice Puoti - Partner, Burges Salmon
Ms Sonia Velasco - Partner, Cuatrecasas Gonçalves Pereira
Arabella Murphy - Partner, Maurice Turnor Gardner
Chair's Opening
11:50 - 11:55
Steam 2 - US
Participants
Joshua Rubenstein - Head of Trusts & Estates, Katten Muchin Rosenman LLP
Discussion of the Possible Tax Law Changes Coming out of the US as a Result of the New Trump Administration
11:55 - 12:35
Steam 2 - US
How is the Trump Administration impacting the income, capital gains, gift, estate, GST and property taxes for:
(i) domestic family offices with international holdings or beneficiaries, 
(ii) CEOs with stock options and 
(iii) large international family foundations.
Participants
Michael Silva - Partner, DLA Piper
Renee Gabbard - Partner, Bryan Cave
Migrating Trusts to the US
12:35 - 13:15
Steam 2 - US
• Why should a trust be moved to the U.S? 
• What are the best U.S. trust jurisdictions and why? 
• Special features found in U.S. trust law 
• Use of U.S. trusts for non-U.S. families 
• Use of U.S. trusts to buy U.S. real estate
Participants
Warren Whitaker - Partner, Day Pitney LLP
Robert Colvin - Principal, Robert D. Colvin & Associate
Chair’s Opening
11:50 - 11:55
Steam 3 - Trust Litigation
Participants
Jim Edmondson - Mourant Ozannes, Mourant Ozannes
Should the Courts Exercise their Discretion to Assist Tax Planning?
11:55 - 12:35
Steam 3 - Trust Litigation
• When the court has discretion to grant relief, should it take into account the tax planning context?
• Is it right that courts permit variations of trusts which are motivated solely to achieve a tax advantage?
• Should the courts grant rescission when a mistake has been made in a tax planning scheme?
• Is there a different attitude between "onshore" and "offshore" courts?
Participants
Rupert Ticehurst - Partner, Berwin Leighton Paisner
Craig MacIntrye - Director, Conyers Dill & Pearman
Emma Hargreaves - Barrister, Serle Court
Unexpected beneficiaries: The Issue about Issue
12:35 - 13:15
Steam 3 - Trust Litigation
Participants
James Brightwell - Barrister, Serle Court
Elspeth Talbot - Rice QC - Barrister, XXIV Old Buildings
Chair's Opening Remarks
11:50 - 11:55
Main agenda
Participants
Sue Medder - Chambers Director, XXIV Old Buildings
Practical Advice on how to Excel in the Private Client Field
11:55 - 12:35
Main agenda
A masterclass in skills all aspiring private client practitioners will need from leader in the field.
Participants
Sue Medder - Chambers Director, XXIV Old Buildings
How to deal with a difficult Client
12:35 - 13:15
Main agenda
Participants
James Price - Partner and Head of Trust and Probate Litigation department, Stewarts Law
Jonathan Speck - Managing Partner, Mourant Ozannes
Lunch
13:15 - 14:15
Main agenda
Keeping Assets Safe in an Uncertain World: Asset Protection, Where Are We Now?
14:15 - 14:55
Main agenda
Participants
Anthony Poulton - Partner, Baker & McKenzie
Dawn Goodman - Partner, Withers
James Price - Partner and Head of Trust and Probate Litigation department, Stewarts Law
Crystal Ball Gazing: 5 Year Plan for the Offshore Jurisdictions
14:55 - 15:25
Main agenda
• Taxation: how will Governments fund their ever-increasing budgets
• Reputational issues: is the morality around tax planning being re-cast?
• “Offshore” jurisdictions - will they have a place in the new world order?
• Disclosure - how far with the current move to transparency go? (And where sits the US in all of this?)
• Trusts - the development of case law attacking trusts
• The rise of populism: will this continue, and what effect will it have on our clients and industry
Participants
Jonathan Dunlop - Vice President, Butterfield Trust (Bermuda) Limited
Russell Cohen - Partner, Farrer & Co
Joshua Rubenstein - Head of Trusts & Estates, Katten Muchin Rosenman LLP
Refreshment Break
15:25 - 15:45
Main agenda
**Judgement of the Trans Trusts International Supreme Court**
15:45 - 16:20
Main agenda

**Participants**
The Honourable Justice David Hayton, The Caribbean Court of Justice
Her Honour Hazel Marshall QC - Lieutenant Bailiff, States of Guernsey
The Hon. Geoffrey Bell, Bermuda
Justice Robin McMillan, Cayman

**Rising Star Winner's Presentation**
16:40 - 17:00
Main agenda

**Close of Conference & Final Remarks from the Chairs**
17:00 - 17:10
Main agenda

**Participants**
Mr Jonathan Conder - Partner, Macfarlanes
Basil Zirinis - Partner, Sullivan & Cromwell LLP

**Farewell Drinks Reception**
17:00 - 18:00
Main agenda
<table>
<thead>
<tr>
<th>TIME</th>
<th>MAIN AGENDA</th>
<th>BREAKFAST BRIEFING - ROOM 1</th>
<th>BREAKFAST BRIEFING - ROOM 2</th>
<th>BREAKFAST BRIEFING - ROOM 3</th>
<th>BREAKFAST BRIEFING - ROOM 4</th>
<th>STEAM 2 - US</th>
<th>STEAM 3 - TRUST LITIGATION</th>
<th>STREAM 1 - EU</th>
</tr>
</thead>
<tbody>
<tr>
<td>08:00</td>
<td></td>
<td>08:30 - Matrimonial Property Regimes</td>
<td>08:30 - Family Office</td>
<td>08:30 - The Pressures on Offshore Jurisdictions</td>
<td>08:30 - To Trust or not to Trust – When Trustees Turn Bad</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>09:00</td>
<td>09:30 - Chairman's Opening Remarks</td>
<td>09:30 - Trans Trusts International Supreme Court</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10:00</td>
<td>10:50 - What impact does the anti-establishment/anti-globalisation political trends in the west have on the clients we look after?</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11:00</td>
<td>11:30 - Refreshment Break</td>
<td>11:50 - Chair's Opening</td>
<td>11:50 - Chair's Opening</td>
<td>11:50 - Discussion of the Possible Tax Law Changes Coming out of the US as a Result of the New Trump Administration</td>
<td>11:55 - Should the Courts Exercise their Discretion to Assist Tax Planning?</td>
<td>11:55 - Chair's Opening</td>
<td>11:55 - UK Non Dom Tax Changes: What Do We Do Now?</td>
<td></td>
</tr>
<tr>
<td>TIME</td>
<td>MAIN AGENDA</td>
<td>BREAKFAST BRIEFING - ROOM 1</td>
<td>BREAKFAST BRIEFING - ROOM 2</td>
<td>BREAKFAST BRIEFING - ROOM 3</td>
<td>BREAKFAST BRIEFING - ROOM 4</td>
<td>STEAM 2 - US</td>
<td>STEAM 3 - TRUST LITIGATION</td>
<td>STREAM 1 - EU</td>
</tr>
<tr>
<td>------</td>
<td>-------------</td>
<td>-----------------------------</td>
<td>-----------------------------</td>
<td>-----------------------------</td>
<td>-----------------------------</td>
<td>--------------</td>
<td>----------------------------</td>
<td>--------------</td>
</tr>
<tr>
<td>12:00</td>
<td>12:35 - How to deal with a difficult Client</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>12:35 - Migrating Trusts to the US</td>
<td>12:35 - Unexpected beneficiaries : The Issue about Issue</td>
<td>12:35 - EU session - Panel of French, Italian, Spain and UK (Planning Update) Tax Competition &amp; Mobility in Europe</td>
</tr>
<tr>
<td>13:00</td>
<td>13:15 - Lunch</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15:00</td>
<td>15:25 - Refreshment Break</td>
<td>15:45 - Judgement of the Trans Trusts International Supreme Court</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>16:00</td>
<td>16:40 - Rising Star Winner's Presentation</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TIME</td>
<td>MAIN AGENDA</td>
<td>BREAKFAST BRIEFING - ROOM 1</td>
<td>BREAKFAST BRIEFING - ROOM 2</td>
<td>BREAKFAST BRIEFING - ROOM 3</td>
<td>BREAKFAST BRIEFING - ROOM 4</td>
<td>STEAM 2 - US</td>
<td>STEAM 3 - TRUST LITIGATION</td>
<td>STREAM 1 - EU</td>
</tr>
<tr>
<td>-------</td>
<td>-------------</td>
<td>-----------------------------</td>
<td>-----------------------------</td>
<td>-----------------------------</td>
<td>-----------------------------</td>
<td>--------------</td>
<td>------------------------------</td>
<td>--------------</td>
</tr>
</tbody>
</table>
| 17:00 | 17:00 - Close of Conference & Final Remarks from the Chairs  
17:00 - Farewell Drinks Reception |                             |                             |                             |                             |              |                              |              |