

# **TAXAND EUROPEAN TAX LIABILITY INSURANCE CONFERENCE**

**Thursday 19 September 2024**

**Doubletree Hilton, Centraal Station, Oosterdoksstraat 4, 1011 DK  
Amsterdam, Netherlands**

## **PROGRAM**



# TAXAND EUROPEAN TAX LIABILITY INSURANCE CONFERENCE 2024

## PROGRAM

**10:00 - 12:30** : Optional pre-conference meetings with your selection of Taxand member firms, brokers and tax insurance companies.

**12:30 - 14:00** : **Networking Lunch**

**14:00 - 14:45** : **Welcome and Market Outlook**

**14:45 - 17:15** : **Four Panel Discussions** led by Taxand member firms and including representatives of brokers and insurers.

**17:15 - 17:30** : **Final remarks and wrap-up**

**17:30 - 21:00** : **Networking drinks and canapes** - Rooftop Doubletree Hilton, Centraal Station, Amsterdam

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## MEET THE CONFERENCE HOSTS



### **Evert-Jan Spoelder, Taxand Netherlands**

Evert-Jan is a partner at Taxand Netherlands, specialising in the investment management sector. With over 18 years' experience advising on Dutch corporate and international tax law, Evert-Jan's areas of expertise include tax structuring, tax compliance and tax monitoring of Dutch and pan-European investment funds (mainly private equity, real estate) and related platforms. He also assists global institutional investors on tax aspects in relation to investments. Evert-Jan is a former chair of the INREV Tax Committee, chair of Taxand Global's Real Estate team and member of the Dutch Private Equity Association. As a member of the Committee on International Tax Affairs of the Dutch Association of Tax Advisers, he advises the Dutch Ministry of Finance on tax legislation.



### **Karel Pellemans, Taxand Netherlands**

Karel is a partner at Taxand Netherlands and has more than 15 years' experience in advising (inter)national clients on transactions, (inter)national fiscal structuring and fiscal optimization. He started his career at a big four firm before joining Taxand Netherlands. Karel advises corporate clients, private equity and institutional investors on (inter)national transactions and the fiscal structuring of domestic and cross border transactions. He advises on all fiscal aspects of a transaction and has experience with buy-side and sell-side due diligence, tax structuring, restructuring, carve-outs, mergers, tax in the SPA and the fiscal structuring of management participations.

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## PANEL 1: TRENDS IN THE TAX LIABILITY INSURANCE MARKET: discussing hot topics in the market



### **Christina Leomy-Voigt, ATOZ Tax Advisers, Taxand Luxembourg (Moderator)**

Christina is a Partner at ATOZ having joined in 2015. She has over 15 years' experience in advising alternative investment fund managers across all asset classes and in structuring Pan-European alternative investment funds for institutional investors. Christina advises a wide range of international clients on direct tax aspects of cross-border transactions, set-up of investment structures, reorganizations and exit planning.



### **Greg Branagan, Mosaic Insurance**

Greg is a Tax Underwriter at Mosaic Insurance, with a broad remit to insure tax risks across Europe and Asia. He joined Mosaic in October 2023, having previously worked for over two years at another insurer. Prior to this, he was a senior associate within the tax team at Norton Rose Fulbright, with over 10 years of experience advising clients on a variety of tax matters.



### **Jakub (Kuba) Grabarz, Howden**

As a Tax Risk Broker, Kuba runs Howden's tax insurance offering in the Netherlands and CEE region. He has more than 10 years of experience as a Dutch qualified tax lawyer. Before joining Howden M&A in January 2021, Kuba worked at Baker McKenzie and Taxand, both in Amsterdam. Kuba holds an LL.B. and LL.M. in tax law from Utrecht University and an LL.M. in international taxation from the University of Florida.



### **Christoph Kubicki, Acquinex**

Christoph is Head of Tax - DACH at Acquinex. He is responsible for the management and the development of the tax insurance product in the DACH region and has been involved in the placement of tax insurance policies covering a variety of different tax risks in particular in the German market. Before joining Acquinex in 2022, he worked in private practice as a tax lawyer mainly in the Financial Services Tax Department of PwC Germany.



### **Egbert van der Graaff, Euclid Transactional**

Egbert van der Graaff is a Senior Vice President at Euclid Transactional. As a tax underwriter, he is responsible for underwriting tax risks for clients across EMEA. Prior to joining Euclid, Egbert was a Senior Tax Underwriter at a global insurance company, having underwritten tax policies across continental Europe. Before joining the insurance industry, Egbert gained a decade of experience working as an international tax advisor with PwC Netherlands, the last 5 of spent in M&A Tax.

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## PANEL 2: PAYOUT OF CLAIMS UNDER TAX LIABILITY INSURANCE POLICIES: Best Practices



### **Thomas Frobert, Bech Bruun, Taxand Denmark (Moderator)**

Thomas is based in Taxand Denmark, where he is a partner of Bech-Bruun. Thomas' main focus is indirect taxation (in particular VAT) and taxation issues related to the energy sector. He has worked intensively with tax since 1996 and has during the last 15 years been involved in a large number of projects regarding structuring and analysis of indirect tax related to corporate and real estate transactions.



### **Staffan Bos, Transact**

Staffan is Head of Tax Insurance at Transact, where he is responsible for running the tax insurance team. He has been working as a tax lawyer since 2015. Prior to joining Transact in 2018, Staffan worked for a Big4 firm and a large law firm. Staffan's pragmatic and commercial approach has contributed to the successful placement of over 200 tax policies, often in relation to complex risks and using innovative insurance solutions.



### **Paul Schouten, AON**

Paul joined Aon in 2023 to build the tax insurance practice in the Benelux region. Previously, he has 10 years of experience as a tax advisor and tax attorney at a big-4 company and a top-tier law firm. Paul has a masters in tax law (2013) and spent 1.5 years working in Tokyo, Japan, in the international tax practice. He is an author for the Dutch magazine for tax law (Nederlands Tijdschrift voor Fiscaal Recht).

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## PANEL 3: WHERE W&I MEETS TAX LIABILITY INSURANCE: understanding the differences and interactions



### **Matthias Full, Flick Gocke Schaumburg, Taxand Germany (Moderator)**

Matthias is a Partner with Flick Gocke Schaumburg in Munich, Germany with 14 years' experience in Private Equity/M&A transaction tax services. Matthias has served private equity investors, corporates, and SPACs on various domestic and international transactions. He covers all tax aspects of the transaction lifecycle and has worked with clients in Europe, North America and Asia across a broad range of industries.



### **Noor Blauw, Ambridge**

Noor joined Ambridge in 2023, with 11 years of experience as an international tax lawyer and tax advisor having worked at Freshfields Bruckhaus Deringer and EY. With specialist knowledge in the areas of (International) Tax, Tax in M&A and SPAs, Noor's focus at Ambridge is on Tax Insurance and Tax under W&I insurance. On the W&I-side Noor is one of the few dedicated Tax underwriters in the market, adding value by being the link between the commercial discussions and Tax technical positions.



### **Paul Dickinson, Themis**

Paul is a qualified tax accountant and fellow of the Institute of Chartered Accountants of England & Wales (FCA) with 20 years post-qualification experience in front office tax structuring/corporate M&A roles at investment banks, including Barclays and Deutsche Bank. He has advised on and structured UK, European, US and Asian tax matters, including M&A, US tax credit transactions and complex restructures spanning a broad range of clients and taxes. Paul graduated in Law from Durham University and has been Head of Tax at Themis since 2019.



### **Stefan Farahani, WTW**

Stefan is WTW's International Head of Tax and Contingent Insurance. The team arranges insurance for a wide range of identified tax risks across the world. Stefan joined the insurance industry in 2015 and has led practices at Marsh and WTW. Prior to that he was a tax lawyer at the law firm Slaughter and May. Stefan holds a Bachelor of Law from the London School of Economics and a Masters in Finance from London Business School.



### **Alejandra Hernandez Irizarry, CFC**

Alejandra is an Underwriting Manager leading the CFC tax practice in London. Since joining 2 years ago, she has underwritten US R&W policies, tax policies and contingent policies across various jurisdictions. Previously, she worked as US international tax consultant primarily advising alternative investment clients on cross-border transactions in an international accounting firm's New York and London offices. Among other areas, Alejandra's practice has focused on tax efficient outbound and inbound investment structuring, reorganizations and carve-outs.

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## PANEL 4: UNDERWRITING PROCEDURES: From risk identification to insurance policy, procedures and pitfalls



### **Jorge Moreira, Garrigues, Taxand Spain (Moderator)**

Jorge has been a partner of the Tax Law Department at Garrigues since 2009 and has extensive experience in resolving complex legal problems, in managing legal and tax risks, and in defending his clients in procedures and litigation against the Administration. Jorge is also one of the most renowned specialists at Garrigues in (re) insurance law and has been recognised year after year as Best Lawyer in both the Tax and Insurance categories.



### **Tim Dobbing, HWF**

Tim is an Associate Director in the Tax Insurance team at HWF. Tim has experience in providing tax insurance solutions for a wide variety of institutional, individual, and corporate clients, and has worked on a significant number of complex, multi-jurisdictional and high value tax policies since joining HWF.



### **Roger Gordo, TMHCC**

Roger joined TMHCC in 2023 as a Tax Underwriter. With over 7 years of experience as a Spanish qualified lawyer, Roger has solid expertise advising on tax matters related to domestic and cross-border transactions. Since joining TMHCC, Roger has led the internal development of the tax risk insurance practice. Roger is also an Associate Professor in Tax Law at ESADE university.



### **Alex McDonald, Solertia**

Alex is a founder and Director of Solertia Insurance, a specialist tax liability MGA underwriter based in London, offering tax liability insurance products to clients throughout Asia, Europe and the Americas. During his 30 year career, Alex has held roles focused on structured finance and tax at Deutsche Bank and AIG, prior to founding Solertia.



### **Adam Singer, Certa**

Adam is a co-founder of Certa with many years of experience of analysing tax issues. He has been underwriting tax insurance since September 2015, when he joined Pembroke Managing Agency, and has underwritten tax risks all around the world. Adam is a regular conference speaker on tax insurance. Prior to joining the insurance industry, Adam spent 9 years as a tax lawyer at Bird & Bird LLP, Nabarro LLP and Allen & Overy LLP.

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