



# DAC 6

## *Training of Lawyers on the EU Directive on Cross-border Tax Arrangements*

*\*Interpretation will be provided into Spanish and Italian*

*09:00 - 09:10 Introduction*

*09:10 - 09:50 Scope of the DAC 6 Directive and concepts of  
"arrangement" and "cross-border"*

*Jonathan Peacock QC, Barrister, United Kingdom, Member of the Tax  
Committee of the Council of Bars and Law Societies of Europe (CCBE)*

*09:50 - 10:30 Hallmark and the Main Benefit Test*

*Alain Claes, Attorney, Belgium, Member of the CCBE's Tax Committee*

*10:30 - 11:10 DAC 6 and professional secrecy/legal professional privilege*

*David Lévy, Lawyer, France, Member of the CCBE's AML Committee*

*11:10 - 11:15 Coffee break*

*11:15 - 13:00 National experiences*

- Cyprus: Charalambos Meivatzis, Lawyer, ACA*
- Italy: Francesco Tundo, Professor of Tax Law, University of Bologna*
- Spain: Luis Manuel Rubí Blanc, Lawyer*
- France: Marc Bornhauser, Lawyer, Former President of the French  
Tax Lawyer Association*

**3 DECEMBER 2021 | ONLINE ON ZOOM**