

Session 4, Wealth without Borders: Tax Challenges of High Net-Worth Individuals



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Masao Yoshimura is a Professor at the Graduate School of Hitotsubashi University in Japan, specializing in corporate tax and international tax law. His research covers a broad range of topics including OECD BEPS initiatives, Two-Pillar solutions, transfer pricing, CFC rules, and corporate reorganization taxation under Japanese law. He serves as a member of the Tax Commission of the Japanese Government.

He is an active member of the International Fiscal Association (IFA) and serves on the steering committee of the IFA Japan Branch.



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Shaun is a partner at Arnold Bloch Leibler advising family offices, founders and boards on high-stakes transactions, cross-border structuring, executive equity and ATO disputes.

Shaun advises a range of clients, including ASX listed companies, family offices, high-net-worth individuals and large private groups. Shaun practices in corporate, international and employment taxes, with particular expertise in mergers and acquisitions, corporate restructures and employee share schemes. He also assists clients to navigate complex tax disputes with the Australian Taxation Office and has litigated significant cases through the Australian courts.

Shaun has been ranked in the Legal 500 Asia Pacific as a Band 1 Next Generation Partner in Tax and has been recognised by Doyle's Guide as a leading tax lawyer. Shaun has been recognised as a 'star' advisor in employee share schemes by the Global Equity Organization and was selected to join its inaugural class of Fellows.



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Maria Chang is a senior foreign attorney in the Tax Practice Group at Shin & Kim.

She advises on a wide range of cross-border tax issues for major Korean and foreign clients across various industry

sectors, including structuring, tax planning, treaty interpretation and cross-border transactions. She also assists foreign clients in managing tax controversies, including tax audit defense, tax appeals and litigation.

Maria is active in various international organizations. She is an officer of the Taxes Committee at the International Bar Association and also currently serves as one of the vice chairs for IFA Korea.



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Yoshiko Yamakawa is an attorney-at-law licensed in Japan (admitted in 2014) and in state of New York (admitted in 2025), and a senior associate at the Tokyo office of Mori Hamada & Matsumoto. She works primarily in the practice areas of tax and wealth management, advising on both domestic and international matters. Her experience includes tax and estate planning, and representing various clients in tax audits, administrative appeal proceedings and tax litigations.



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Rachel Saw is Head of IBFD's Asia Pacific Office in Kuala Lumpur, Malaysia, where she leads the organisation's regional engagement and thought leadership across Asia Pacific. She specialises in cross-border taxation, with experience spanning both tax administration and tax policy, and is particularly focused on the implications of global tax developments for developing and emerging economies.

Rachel is closely involved in advancing international tax capacity building in the region. She teaches in IBFD's International Tax Training programmes and at the Malaysian Tax Academy, and has contributed to technical assistance and training initiatives with organisations including the Asian Development Bank and the OECD across multiple Asian jurisdictions.

A well-regarded voice in Asia Pacific tax circles, Rachel is a regular speaker at international conferences, known for bringing clear, practical perspectives to complex cross-border tax issues and policy developments.