EXCHANGEIDEAS
Tax | Wealth Management | Compliance

Poland Tax Conference 2018

November 13, 2018 – Warsaw

In today's tax transparent and globalized world, companies, wealth owners and their advisors face a set of new and demanding regulatory and tax compliance challenges. Recent developments in the area of tax transparency and exchange of information for tax purposes have created a competitive landscape in which efficiently complying with tax laws is a key to success.

The Poland Tax Conference 2018 will discuss the most recent developments in Polish tax law, both from a domestic and international tax law perspectives. Outstanding tax practitioners and scholars will explore the key issues to succeed in a tax transparent world structuring cross border tax-compliant planning.

The conference will begin with an overview on the recent developments in Polish domestic tax law. In that sense, Personal and Corporate Income Tax laws will be thoroughly discussed, along with the recent Polish "Exit Tax" regulations that follow the EU "anti-avoidance" Directive. Furthermore, CFC and "anti-tax" legislation will be deeply analysed, including the approach adopted by the tax authorities and courts, as well as recommendations and commentaries on the latest rulings.

Later in the afternoon, the focus will shift to Poland's international tax law. In particular, the current status of implementation of BEPS in Poland will be discussed, with emphasis on which have been the latest changes in transparency and substance for Poland (Automatic Exchange of Information, FATCA, etc.).

Following, the implementation of BEPS in Poland will be further discussed but from a purely reporting perspective. Mandatory disclosure rules, such as those provided for in Action 12, and their impact in confidentiality and professional secrecy will be referred to in relation to their reception by Polish law.

Finally, the conference will conclude with three panel discussions. On the one hand, the first panel will be aimed at discussing tax-compliant planning alternatives for Polish individuals and corporations involving selected jurisdictions such as Luxemburg, Netherlands, Malta, Cyprus and Liechtenstein. On the other hand, the second panel will refer to the tax schemes' reporting obligations for the tax and financial advisers, family officers, and how that may impact confidentiality of the clients and wealth protection structuring. The third discussion will refer to the importance of asset protection in the current design of wealth protection structures. Furthermore, the panel will address different tax planning strategies for Polish individuals and corporations.

Sponsored by

I&F INDUSTRIE-UND FINANZKONTOR
WEALTH PRESERVATION EXPERTS

KPMG

Supported by

WOLF THEISS

DZP
więcej niż prawo

PROGRAM

13:30	**Welcome and Registration**
14:00	**Overview on the latest developments in Polish domestic tax law** • Overview on the relevant recent developments in Polish domestic tax law, including PIT and CIT laws • CFC legislation – recent changes, practice, loopholes, impact on the existing structures and assets' holding structures • Anti-tax avoidance legislation – current experiences, approach of the tax authorities and courts, recommendations and latest rulings • New exit taxation rules based on the EU Directive ***Chair:* Joanna Wierzejska (DZP) *Speakers*: Grzegorz Sprawka (DZP), Aldona Leszczyńska (GWW)**
15:00	**Overview on the relevant recent developments in Polish international tax law** • Overview on the relevant recent developments in Polish international tax law. Status of the implementation of BEPS in Poland • Effects of the latest changes (AEOI, FATCA/QI) in approach of the Polish tax authorities towards transparency and substance for Poland ***Chair:* Joanna Wierzejska (DZP) *Speaker*: Karolina Stawowska (Wolf Theiss)**
15:30	**Overview on the law on reporting requirements relevant recent developments in Polish international tax law** • Overview on the relevant new regulations and obligations of advisors • Implementation of BEPS Action plan (Action 12) and related reporting obligations in Polish domestic law • Confidentiality and professional secrecy issues arising from the obligation of disclosing client information ***Chair:* Andrzej Marczak (KPMG) *Speaker:* Andrzej Marczak (KPMG)**
16:00	**Coffee break**
16:30	**Panel I: Tax planning in Poland in the post BEPS era: transparency and substance with reference to selected jurisdictions such as Luxemburg, Netherlands, Malta, Cyprus, Liechtenstein** • Tax-compliant planning strategies for Polish individuals and corporations in the post BEPS era meeting the requirements of transparency and substance • Polish foundation law – limitations for charity and succession planning – justification for alternatives through the use of wealth management structures (collective investment funds, corporate entities, foundations, trusts, etc.) • Case studies on new exit taxation rules based on the EU Directive – impact on tax planning opportunities ***Chair:* Karolina Stawowska (Wolf Theiss), *Panelists:* Aldona Leszczyńska (GWW), Joanna Wierzejska (DZP), Andrzej Marczak (KPMG)**
17:00	**Panel II: Wealth protection and tax advisory in the world of the obligatory tax schemes' reporting** • How many the role of the tax and financial advisors change in the new reporting environment? • How should risk be managed? • Would family officers from abroad take a leading role in advisory services? ***Chair:* Andrzej Marczak (KPMG), *Panelists*: Artur Nowak (DZP)(, Aldona Leszczyńska (GWW), Joanna Wierzejska (DZP)**

17:30	**Panel III: Tax-compliant planning for Polish individuals and corporate entities through wealth management structures in a comparative view with selected jurisdictions such as Switzerland and Liechtenstein**

- Asset protection as a key element for wealth preservation in a tax transparent world
- Examples and discussion on asset protection and confidentiality structures under CFC, ATAD, exit taxation and MLI. Issues arising in typical structures
- Case studies from a Polish perspective and selected jurisdictions. Inbound scenarios (Swiss and Liechtenstein investors investing in Poland)
- Case studies from a Polish perspective and selected jurisdictions. Outbound scenarios (Poland using Switzerland or Liechtenstein for investment purposes)

***Chair:* Roland A. Pfister, *Speakers*: Count Francis von Seilern-Aspang (Liechtenstein)**

18:00	**Aperitif**

INFORMATION

Aldona Leszczyńska-Mikulska | GWW

Aldona has been working with taxes since 1999. Started her professional career at the International Tax Planning Department of the Warsaw office of Ernst&Young. She specializes in international tax and inheritance planning. Aldona advises clients in cases and disputes relating to private property, family and spousal cases. She takes part in processes connected with generation changes in family-owned businesses. She is a member of the International Fiscal Association (IFA). Member of Society of Trust and Estate Practitioners, London branch. With GWW since 2016.

Andrzej Marczak | KPMG, Warsaw

Andrzej is a lawyer and chartered tax adviser. He specializes in income tax, including international aspects of taxation. He is involved mainly in the tax optimization of international executives, tax structuring for wealthy individuals, including the use of friendly tax jurisdictions and advice regarding tax efficient remuneration schemes. Andrzej represents clients in tax cases before the authorities and administrative courts. His role as a partner at KPMG is to oversee the work of the Global Mobility Services (GMS) team. He is the vicepresident of the National Chamber of Tax Advisers.

Artur Nowak | Domański Zakrzewski Palinka, Warsaw

Artur is a renowned expert in tax audits, tax disputes, and the preparation and effective implementation of tax litigation strategies. He advises and represents clients in criminal tax cases and has long experience in providing tax advice in tax audits and on day-to-day tax matters gained in leading international and domestic advisory firms. Artur represents clients before the tax authorities, fiscal control authorities, enforcement authorities, the European Commission, the Voivodship Administrative Court, the Supreme Administrative Court and the Constitutional Tribunal. Artur is an expert in tax litigation and was distinguished by Gazeta Prawna in its Tax Adviser Rankings in 2008, 2009 and 2010. He is also recommended by Chambers and Legal 500 EMEA. He has authored numerous publications on tax law and tax procedure.

Dr. Roland A. Pfister | Badertscher Attorneys at Law, Zurich/Zug | Lucerne University of Applied Sciences and Arts, Lucerne/Zug

Roland studied law at the Universities of Neuchâtel and Granada. After graduating from law school, he worked for an international law firm in Belgium and a leading investment bank in Zurich. Later, he joined the tax department of one of the “Big Four” firms in Zurich/Geneva. From 2011 to 2014, he worked at a law firm in Geneva. Since 2015, he works at an international corporate and tax law firm in Zurich/Zug. In addition, Roland holds an Executive MBA in Wealth Management, and a PhD in international tax law from the University of Neuchâtel. Roland was also a Visiting Researcher at Harvard Law School. He is a regular contributor to tax journals and lectures frequently in postgraduate tax programs. His main areas of expertise include both domestic Swiss and Liechtenstein as well as international tax law with a particular emphasis on tax-compliant wealth planning for high net-worth individuals and corporate entities (including funds, trusts and partnerships). His practice also focuses on the taxation of international investment structures (in particular private equity structures) for private and institutional investors.

INFORMATION

Grzegorz Sprawka | Domański Zakrzewski Palinka, Warsaw
Grzegorz has over 12 years' experience in providing full-range tax advice. Aside of financial sector and merger and acquisitions, he is focused on advising private clients including development of structures for wealth protection and succession purposes, assisting in tax compliance and reporting obligations. He also advised corporate clients, private equity and hedge funds on mergers and acquisitions, structuring international acquisitions and reorganising capital groups for investment funds and sector investors. Before DZP Grzegorz gained his experience in the M&A team at Big Four company. He is chartered tax advisor and attorney-at-law.

Karolina Stawowska | Wolf Theiss, Warsaw
Karolina Stawowska heads the local Tax team in Warsaw. She is a tax and business adviser with over 20 years of professional experience acting for corporate clients, private individuals, and private equity and venture capital funds. Karolina has worked on the restructuring of capital groups, development of tax strategies for acquisitions and sales of companies, and investment financing. She also has extensive experience in tax proceedings and conducting tax litigation in administrative courts. Prior to joining Wolf Theiss, Karolina worked at other prominent international law firms and at a Big Four accounting and consulting firm in Warsaw. She is a member of the National Bar of Tax Advisors.

Joanna Wierzejska | Domański Zakrzewski Palinka, Warsaw
Joanna is a tax adviser with a great deal of experience in providing comprehensive tax advice to clients in various sectors in Poland in matters relating to mergers and acquisitions and the selection of effective tax structures for their operations, investments and transactions. She has also advised in many restructuring, privatisation and merger processes. She has extensive experience in advising private equity entities and sector investors. Joanna advises many private investors, entrepreneurs and their families on reorganising and developing their businesses, succession processes, private property protection, reporting on foreign assets, establishing foundations and changing tax residence. Joanna is a licensed tax adviser with 20 years' experience gained at PricewaterhouseCoopers and DZP. She has headed DZP's Tax Practice since 2010.

Count Francis von Seilern-Aspang I INDUSTRIE- UND FINANZKONTOR ETS, WEALTH PRESERVATION EXPERTS, Vaduz
Count Francis von Seilern-Aspang is Managing Director of Industrie- und Finanzkontor Ets., a leading trust company with a tradition and expertise in the long-term and trans-generational preservation of wealth, especially family wealth. Furthermore, he is Vice Chairman of Seilern Investment Management Ltd., an independent and privately-owned investment management company in quality-growth equities. In addition, Count Francis von Seilern-Aspang is a member of STEP (Society of Trust and Estate Practitioners).

INFORMATION

Exchange Ideas is an international learning, training and networking platform on tax, wealth management and compliance focusing on practical matters and connecting financial advisors, family offices, lawyers, trustees, fund managers, and investors (“solution seekers”) with leading practitioners and academics in the field (“solution providers”). Exchange Ideas’ philosophy is to provide a platform that serves both ends of the relationship, by connecting members and allowing them to benefit from a leading advisory community, and to share the latest trends, knowledge and expertise in an efficient and cost-effective manner.

Participants

Entrepreneurs, tax specialists, lawyers, fiduciaries, private equity and hedge fund managers, representatives of trust companies and family offices, relationship managers and anyone with an interest in the areas of tax, wealth management and compliance.

Exchange Ideas

All participants may participate during the conference by asking questions directly or submitting written questions in advance to: info@exchange-ideas.com

Date & Time

Thursday, 13th November 2018. From 1:30 pm to 6:00 pm.

Language

The conference will be mainly in Polish.

Venue

The event will be held at the InterContinental Warsaw located on Emilii Plater 49 Street, 00-125 Warsaw. For detailed information on how to get to the venue please visit the venue website: http://warszawa.intercontinental.com/en/

Registration

Online registration is available via the following link: http://www.cvent.com/d/7bq7ml/4W

Registration fee:	Early Bird* Non-Member Euro 90	Early Bird* New-Member Euro 140
	Standard Non-Member Euro 140	Standard New-Member 190 (excl. VAT)

*Early Bird rates must be booked and paid by 13th October 2018.

Accommodation

Preferential accommodation rates have been negotiated with the InterContinental Warsaw. Standard single guestrooms from PLN 610 + tax and standard twin guestrooms from PLN 650 + tax. You can book your accommodation rooms directly via email to: reservas@sheratonsaopaulowtc.com

Contact Us

Email: info@exchange-ideas.com

Join us on social media

Sponsored by

I&F INDUSTRIE-UND FINANZKONTOR WEALTH PRESERVATION EXPERTS

KPMG

Supported by

WOLF THEISS

DZP więcej niż prawo