2019 LONDON TAX CONFERENCE

28 February 2019 – London

In today's tax transparent and globalized world, 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 2019 London Tax Conference will discuss the most recent developments in UK tax law, both from a domestic and international tax law perspective. From a UK regulatory point of view, topics such as the reform to the Substantial Shareholding Exemption (SSE) and the current status of R&D tax relief will be addressed in particular. In relation to international tax matters, BEPS Actions on anti-hybrid rules, permanent establishments, transfer pricing and mandatory disclosure rules will be discussed in the light of the UK's current tax scenario.

Finally, the Conference will conclude with two different workshops. The first one will refer to tax-compliant planning strategies for UK individuals and corporate entities and the current transparency and substance requirements. The second workshop will deal with tax planning for individuals and corporate entities but through the use of wealth management structures. The analysis will include a comparative view between the UK and selected jurisdictions: Liechtenstein, Switzerland, the Netherlands and Austria.

Sponsored by

I&F
INDUSTRIE- UND FINANZKONTOR
WEALTH PRESERVATION EXPERTS

Supported by

EdwinCoe LLP
LAW FIRM

PROGRAM

13:00	**Welcome and Registration**

13:30 — **Overview on the latest developments for individuals and corporations under UK domestic tax law**

- Current restrictions to the deductibility of corporate interest.
- Use and misuse of corporate losses (NOLs) – loopholes, practice, approach of the tax authorities and courts, recommendations and latest rulings.
- The 2016 reform to the Substantial Shareholding Exemption (SSE) – purpose of the reform, affected taxpayers and requirements.
- Corporation tax relief on Research & Development (R&D) projects – eligibility criteria and types of R&D relief.

***Chair:* Andrew Terry; *Speaker:* Adam Dolder**

14:15 — **Overview on the latest developments in UK and international tax law**

- General comments in regards to the BEPS Action Plan on International tax planning from UK and EU perspective Enhanced transparency and substance requirements.
- Implementation of BEPS Action 2 in UK and EU domestic legislation. Anti-Hybrid rules.
- BEPS Action 7: Countering artificial avoidance of permanent establishment status.
- BEPS Actions 8-10: Transfer pricing (intangibles, risk & capital and high-risk transactions).
- Implementation of BEPS Action 12: Mandatory disclosure rules. The EU Directive 2018/822 on transparency requirements for tax intermediaries and the next steps for implementation in the UK in the light of the UK DOTAS regime.

***Chair:* Andrew Terry; *Speaker:* Dr. Roland A. Pfister, Niklas Schmidt, Marieke Bakker**

15:00	**Coffee Break**

15:30 — **Workshop I: Case studies on tax planning for UK individuals and corporate entities in the post BEPS era: transparency and substance**

- Tax-compliant planning strategies for UK individuals and corporate entities in the post BEPS era. Transparency and substance requirements. Analysis of other key issues such as withholding taxes.
- The UK as a holding company location.
- Benchmarking with other popular locations such as the Netherlands, Austria, Hungary, Luxembourg and Switzerland. Significant tax developments in the aforementioned jurisdictions.
- Impact of BREXIT and EU tax law developments in tax planning strategies for UK individuals and corporate entities.

***Chair:* Marieke Bakker; *Speaker:* Andrew Terry, Dr. Roland A. Pfister, Niklas Schmidt, Sean Bannister**

16:15 — **Workshop II: Case studies on tax planning for individuals and corporate entities through wealth management structures a comparative view with selected jurisdictions: Switzerland, Liechtenstein, the Netherlands and Austria.**

- Case studies on tax planning from a UK perspective and selected jurisdictions. Inbound and Outbound.
- Wealth Planning Structures for Russia and /CIS Clients.
- Case studies involving different jurisdictions such as Switzerland, Liechtenstein, the Netherlands and Austria.
- Latest developments and issues under Russian domestic tax law (*i.e.:* CFC rules, tax amnesty, interpretation of the beneficial ownership concept, tax treatment of capital gains, etc.).
- Importance of bilateral investment treaties. Russian interpretation of the UK-Russia Double Tax Treaty in terms of residency (Case No. A40-229342/17-115-4656, 29 May 2018).

***Chair:* Maxim Simonov; *Speaker:* Dr. Roland A. Pfister, Niklas Schmidt, Sean Bannister, Marc Zahn**

PROGRAM

17:00	**International Tax Investigations in the new era** • Impact of the Common Reporting Standard (CRS) and deeper transparency requirements at a global level. • Unexplained wealth order (UWOs). Next steps from an UK perspective. Politically Exposed Persons (PEPs), suspicious transactions and the so-called “Magnitsky amendment”. • Significant amendments to the UKL penalty regime: Asset based penalties. • The ‘Requirement to Correct’ (RTC) regime. 'Failure to Correct' UK tax irregularities before September 30, 2018. Penalties. ***Speaker:* Frank Strachan**
18:00	**Conclusion and final remarks**
18:15	**Reception**

SPEAKERS BIOGRAPHY

Marieke Bakker | Loyens & Loeff

Marieke Bakker, a tax adviser, is a member of the International Tax Services practice group. She specialises in cross-border tax issues. She headed the Zurich office for four years and worked for six months at an Australian law firm in Sydney. Marieke Bakker used to teach at the LLM tax programs of the Universities in Zurich and Lausanne, and at the Dutch Association for Tax Advisers, teaching on mergers and split-offs. She also worked as a research associate at the Erasmus University Rotterdam. She is a member of the International Fiscal Association (IFA) and of the Dutch Tax Advisors Association (NOB). Marieke was a member of the Executive Board at Loyens & Loeff from April 2016 until October 2018, the last six months as managing partner.

Sean Bannister I Edwin Coe LLP

Sean Bannister is a Partner within the Tax practice at Edwin Coe and leads the advisory business. He acts for high-net and ultra-high-net-worth individuals and families and those that advise them (financial service providers and corporate service provider/trustees). Principally acting for clients with assets and business interests globally, Sean is well versed on multi-jurisdictional issues and has a wealth of experience advising those who are seeking to ensure their tax affairs are administered in a framework that is both effective and compliant. A particular strength is advising non-domiciled clients as to how best to navigate the UK tax landscape and maximise their position, as well as assisting non-UK residents who are looking to acquire business or property interests in the UK and structure their arrangements effectively. Sean Bannister has also advised a number of non-UK trustees/directors as to their UK tax position and the impact of several significant legislative changes in the most recent years.

Adam Dolder I Withers LLP

Adam Dolder is an associate in the private client and tax team based in London. He deals with all aspects of UK corporate and business taxation, including financing arrangements, business sales, company sales, commercial real estate transactions and various employment and partnership matters. His work is mainly advisory and transactional in nature but also involves occasional forays into tax-based litigation and contentious matters.

Dr. Roland A. Pfister I Badertscher Attorneys at Law | Lucerne University of Applied Sciences and Arts

Roland Pfister 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. As of 2015, he works at an international corporate and tax law firm in Zurich/Zug. In addition, he holds an Executive MBA in Wealth Management, was a Visiting Researcher at Harvard Law School and attained his PhD in international tax law from the University of Neuchâtel. 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). Furthermore, his practice focuses on the taxation of international investment structures (in particular private equity structures) for private and institutional investors.

SPEAKERS BIOGRAPHY

Dr. Niklas J. R. M. Schmidt | Wolf Theiss Attorneys at Law, Vienna

Niklas Schmidt has been admitted as a lawyer and as a tax adviser and is a partner at WOLF THEISS, the largest Austrian law firm. He. His areas of specialization include tax law, corporate law and private clients. Previously, Niklas worked for several years at a "Big Four" firm. His publications include various books and articles in international tax journals. Niklas Schmidt is frequently engaged as a speaker at tax conferences and has been a visiting lecturer at various universities. Currently, he sits on the editorial board of the "SteuerExpress" magazine. Furthermore, Niklas Schmidt is a member of the International Fiscal Association (IFA), the International Bar Association (IBA), the International Tax Planning Association (ITPA), and the Society of Trust and Estate Practitioners (STEP). He has been named one of Austria's top ten tax lawyers in the Austrian magazine "Trend", and is ranked in band 1 by many international legal directories.

PhD Maxim Simonov | Duvernoix Legal

In 2003 Maxim Simonov graduated from Ural law institute. In 2007 he became PhD in law (tax field). In 2008 he obtained the professional certificate of a tax consultant. In 2009 he joined Russian law association. Before Duvernoix Legal Maxim Simonov worked as a tax consultant for several Ekaterinburg and St. Petersburg leading consulting companies. He has over 80 professional publications on actual tax topics. Maxim Simonov joined Duvernoix Legal as a senior associate in 2012. Since June 2015 Maxim Simonov is the head of tax practice of the Firm. His Specialization - Tax law, deal structuring, tax planning. Duvernoix Legal is a large Russian law firm that has been providing a wide range of services in various areas of law since 1999. From April 2008 to April 2013, Duvernoix Legal was the first Russian company associated with one of the world’s top 25 law firms SNR Denton (Denton Wilde Sapte until 2010).

Frank Strachan | Edwin Coe LLP

Frank Strachan has more than 25 years’ experience in tax dispute matters and is recognised as one of the leading practitioners in this specialised field. His detailed knowledge of HMRC’s practices and procedures means that he is able to achieve excellent settlement terms for clients. Frank Strachan has been trusted by many high-profile personalities in the media and sports world who have been investigated by HMRC to take on a dual role of ensuring that the investigation is finalised efficiently and effectively, but also to ensure that the details of the investigation do not become public knowledge. Frank Strachan is ranked as one of the 50 Most Influential Private Client practitioners by *eprivateclient* in 2017 and a Leading Individual in the 2016 Citywealth Leaders List.

Andrew Terry | Edwin Coe LLP

Andrew Terry is an expert international tax practitioner with expertise on the Russia/CIS market. He was one of the first practitioners to use trusts as a planning and asset protection tools for Russian and CIS clients. Andrew Terry has over 33 years’ experience practicing tax law in the City of London. Andrew Terry advises ultra-high-net-worth individuals on trust and foundation structures and the business underlying such structures. He also provides corporate tax support for corporate transactions including M&A and banking, and VAT consultancy advice.

SPEAKERS BIOGRAPHY

Marc Zahn | INDUSTRIE- UND FINANZKONTOR ETS., WEALTH PRESERVATION EXPERTS

Marc Zahn is Chief Executive Officer 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. He has broad experience in the banking and high-tech industry. Prior to Industrie- und Finanzkontor Ets., Marc Zahn held two CEO functions in banks and in a stock exchange. He worked in Switzerland, France and Germany, South Africa, the UK and USA. Marc Zahn holds various Board and Foundation Council positions in various industries. He studied at the Zurich University of Applied Science and did post-graduate Executive MBA's at Harvard and St. Gall Business School.

DETAILS

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

Wednesday, 28th February 2019. From 1:00 pm to 6:15 pm.

Language

Due to the international content and multinational speakers and attendants, the conference will be in the English language. No translation will be provided.

Venue

The event will be held at The Law Society, 113 Chancery Lane, London WC2A 1PL. For detailed information on how to get to the venue please visit the venue website: http://www.113chancerylane.co.uk/

Registration

Online registration is available via the following link: http://www.cvent.com/d/rbqt75/4W

Registration fee (excl. VAT):

Early Bird*	Members £ 140	Non-Members £ 160
Standard	Members £ 170	Non-Members £ 190

*until 15th January 2019

Contact Us

Email: info@exchange-ideas.com

Join us on social media

Sponsored by

I&F INDUSTRIE- UND FINANZKONTOR
WEALTH PRESERVATION EXPERTS

Supported by

EdwinCoe LLP
LAW FIRM