



Argentina Tax Conference 2020

March 17, 2020 – Buenos Aires

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

In this context, the Argentina Tax Conference 2020 will discuss the most recent developments in Argentinian 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 of the recent developments in Argentina's domestic tax law. This section will include a discussion of the amendments introduced by the 2017 Tax Reform, as well as more recent changes in domestic law affecting international commerce: taxes on imports and exports and taxation of foreign currency. Practitioners will offer their perspective on status of CFC legislation and anti-tax avoidance legislation.

Later in the afternoon, the focus will shift to Argentina's international tax law latest developments. This section will cover the status of BEPS in Argentina as well as the BEPS-related amendments introduced by the Tax Reform, as well as the ratification of the MLI Convention. This section will also provide an overview of the most recent Double Tax Conventions entered into by Argentina, including those agreements currently in force and those executed but not yet in force. This block will conclude with an analysis of the digital economy taxation and application of VAT to digital services.

Further, the conference will review different wealth protection and succession planning structures in the post-BEPS era. This section offers an overview of new structures that adapt to the current tax environment; in particular, the latest demands in terms of transparency and substance. Additionally, this section will address the use of Investment Funds as a mechanism for tax complaint tax planning. The section will conclude with an analysis of the current status of the exchange of information agreements signed by Argentina.

Finally, the conference will dive into four practical discussion panels. These panels will discuss alternatives available for Argentine individuals and corporate entities from a cross-border perspective. The panels will focus on practical examples and case studies involving selected jurisdictions: Brazil, United States, Switzerland and Liechtenstein.

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PROGRAM

13:30 Welcome and Registration

14:00 Overview on the latest developments in Argentine domestic tax law and practice

- 2017 Tax Reform (Law 27.430): main amendments, tax transparency rules, indirect sale of Argentina assets, rules for determining low or zero-tax jurisdictions, tax on financial gains (“schedular tax”) and thin capitalization rules.
- Latest amendments to the domestic tax system: export taxes, import taxes, and tax on U.S. dollar purchases. Implications for international commerce and cross-border transactions.
- Anti-tax avoidance legislation – current experiences, approach of the tax authorities and courts, recommendations and latest rulings.
- CFC legislation – practice, loopholes, impact on the existing structures such as foundations and investment funds (collective, closed-ended and alternative) and other holding structures.

Chair: Leandro Passarella, **Speakers:** Axel Verstraeten, Pablo Martin Muir and Maximiliano Yudica Bartels

15:00 Overview on the relevant recent and expected developments in Argentinean international tax law

- Overview on the relevant recent developments in Argentinean international tax law:
 - Status of the implementation of BEPS in Argentina.
 - Beneficial ownership concept and impact on flow of dividends and interest.
 - Ratification of MLI Convention (status).
 - Other amendments related to BEPS included in Argentine tax legislation as a result of 2017 Tax Reform.
 - Latest Double Tax Conventions (DTC) signed by Argentina: Mexico, Switzerland (clarifications on refund/exemption of the “anticipated tax”), Chile (clarifications on the “Most Favored Nation” clause), France (clarifications on art.11.3) and UAE.
 - Brief comments on particularities of DTCs signed by Argentina but not yet in force: Austria, China, Japan, Luxembourg, Qatar, US and Turkey.
 - Particular focus on DTC with Brazil: main amendments to the previous DTC, broad definition of “technical services”, identification of the most common issues arising from the application of the DTC’s provisions. Practical case study involving cross-border payment of service fees.
- Taxation of digital services in VAT. Digital economy vs permanent establishment and digital tax concept – expected developments.

Chair: Mariana Baron, **Speakers:** Axel Verstraeten and Marcelo Quintiliani

15:30 Wealth Preservation and Asset Protection in Liechtenstein

- Recent changes in Liechtenstein’s trustee law.
- Essentials to asset protection in Liechtenstein.
- Automatic Exchange of Information in Liechtenstein.
- Liechtenstein Protected Cell Company.
- International Private Label Funds in Liechtenstein.

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

16:00 Coffee break

16:30 Global Wealth and Asset Management Market

- The Swiss economy.
- The Swiss Wealth and Asset Management Market.
- Why investors like Switzerland.
- FINAPORT – a Global Financial Expert based in Switzerland, United States and Singapore.

Speaker: Dr. Philipp Hofstetter



PROGRAM

16:40	<p>Workshop I: Considerations for Argentine individuals and corporate entities investing in the US</p> <ul style="list-style-type: none">• Impact of the Trump Tax Reform in a cross-border scenario: repercussions in Argentina.• Exchange of information for tax purposes: current status, impact from an Argentine perspective.• Case studies: inbound scenarios (US investors investing in Argentina) and outbound scenarios (Argentine investors using the US for investment purposes).• Excursus on immigration related issues for Argentinian investors in the US. <p><u>Speaker:</u> Mariana Baron</p>
17:25	<p>Workshop II: Considerations for Argentine individuals and corporate entities investing in Switzerland and Liechtenstein</p> <ul style="list-style-type: none">• Case studies: inbound scenarios (Swiss/Liechtenstein investors investing in Argentina) and outbound scenarios (Argentine investors using Switzerland/Liechtenstein for asset protection purposes). <p><u>Speaker:</u> Dr. Roland A. Pfister</p>
17:50	<p>Workshop III: Considerations for Argentine individuals and corporate entities investing in Brazil</p> <ul style="list-style-type: none">• Case studies: inbound scenarios (Brazilian investors investing in Argentina) and outbound scenarios (Argentine investors using Brazil for asset protection purposes). <p><u>Speaker:</u> Frederico de Almeida Fonseca</p>
18:10	<p>Aperitif</p>



Axel Verstraeten | Estudio Levene, Argentina

Axel Verstraeten is a partner at Estudio Levene. He received a law degree from University of Buenos Aires. He holds an LL.M in Internacional Taxation from University of Florida. As part of his expertise, he has provided tax counsel in local and international deals. Also, Mr. Verstraeten is an author of tax articles published in Argentina and abroad.



Count Francis von Seilern-Aspang, TEP | INDUSTRIE- UND FINANZKONTOR ETS, Liechtenstein

Count Francis von Seilern-Aspang is Managing Director and Chairman of the Executive Committee of Industrie- und Finanzkontor Ets., a leading trust company with tradition and expertise in the long-term and multi-generational preservation of wealth, family values and businesses. 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 the Society of Trust and Estate Practitioners (STEP).



Frederico de Almeida Fonseca | Rolim, Viotti & Leite Campos, Brazil

Frederico de Almeida Fonseca studied Law at the Pontifical Catholic University of Minas Gerais (PUC), Brazil. He holds an LL.M. in Tax and Corporate Law from the Milton Campos University and an LL.M. in Regulatory Law from the Fundação Getulio Vargas (FGV), with a focus on the taxation of the Brazilian Energy Sector. Frederico is now the Head of the Tax Consulting department of Rolim, Viotti & Leite Campos Attorneys at Law (Minas Gerais) with his focus on national and international tax and estate planning as well as M&A transactions. He is a tax lecturer in many LL.M. Programs in Brazil and participates in both Corporate and Regulatory Commissions at the Brazilian Bar Association.



Leandro M. Passarella | Passarella Abogados, Argentina

Leandro M. Passarella is a lawyer (U.B.A., diploma of honor). In 1998, he jointly obtained the Masters of Laws degree and the International Tax Program certificate at Harvard Law School. In 2010, he set up his boutique tax law firm, Passarella Abogados, which provides advice on tax and corporate matters. That year, International Tax Review granted Passarella Abogados the Best Newcomer Firm of the Americas award. In 2015 Mr. Passarella received the Client Choice award in the Corporate Tax category for Argentina. In 2020, Leandro Passarella was recognized as one of the Argentine Thought Leaders in Corporate Tax by Who's Who Legal, and Passarella Abogados has been recognized by World Tax. He is a member of the Argentine Association of Fiscal Studies, the International Bar Association (regularly participating in his conferences as co-chair or speaker in panels of his specialty), and the International Fiscal Association.



Dr. Marcelo Quintiliani | UCES, Argentina

Dr. Marcelo C. Quintiliani is a Senior Professor at UCES. He studied law at the University of Buenos Aires, where he graduated with an honor. He worked in the Legislative Information Office of the Ministry of Economy until 2005, when he joined the Tax Administration (AFIP). Currently, he is a member of the AFIP's Agreement Department. In addition, he has a MA in International Relations and Negotiations at Saint Andrew's University, a MA in International Economic Relations at Barcelona University and an LLM in Tax Law at Torcuato Di Tella University. Furthermore, he has been working as senior professor of the "Tax Administration" course at the University of Economic and Social Sciences since 2016 and associate professor of the "Introduction to international scenarios" course since 2017 for the Foreign Trade career.



Mariana Baron | Preti Flaherty, United States of America

Mariana graduated from Universidad Austral, Buenos Aires, Argentina in 2008. After graduating law school, she worked in the tax group of a leading law firm in Buenos Aires, in both litigation and transactional tax matters. While working in Buenos Aires, she pursued a Master Degree in Tax Law from Universidad Torcuato Di Tella, and later an LL.M. from Boston College, in Boston, United States. After her LL.M., she served as a law clerk for the Hon. William G. Young at the U.S. District Court for the District of Massachusetts. Mariana currently practices corporate and tax law at Preti Flaherty in the United States, where she advises local and international clients on corporate and tax legal matters. Mariana also advises foreign investors on US immigration law issues.



Maximiliano Yudica Bartels | Bruchou, Fernandez Madero & Lombardi, Argentina

Maximiliano Yudica Bartels is a lawyer at Bruchou, Fernandez Madero & Lombardi. He received a law degree from the Law School of the University of Buenos Aires. Mr. Yudica Bartels has developed his entire career at firm as member of Tax Department with special focus on Tax Law and Tax Planning. As part of his expertise, he has provided tax counsel in local and international deals, business restructuring, banking and capital markets operations, and national and cross-border tax planning. In addition, Mr. Yudica Bartels also renders tax and legal advice to mutual funds and he has participated in the design of investment structures for real estate, private banking and other industries in local and international projects. He has been speaker in tax seminars in the Asociación Argentina de Estudios Fiscales and in the Consejo Profesional de Ciencias Económicas.



SPEAKERS



Pablo Martin Muir | Bruchou, Fernandez Madero & Lombardi, Argentina

Pablo Martin Muir is a lawyer at Bruchou, Fernandez Madero & Lombardi. He graduated with honors from the Law School of the University of Buenos Aires in 2011 and he obtained a master degree in Tax Law in the Torcuato Di Tella University, with focus on the economic and financial effects of taxes. Mr. Muir specializes in Tax Law. As part of his practice, he provides tax advice to corporate clients in local and international tax planning for deals, M&As, capital market deals and financing structures. Mr. Muir also focuses his practice on tax and estate planning, wealth management and succession structures for local and international individuals. He has advised banks, private bankers, trustees and financial managers on family, succession and tax related matters. Mr. Muir has participated in tax conferences and is author of publications on tax and wealth management matters in Argentine and international publications.



Dr. Philipp A. Hofstetter | Finaport Ltd., Switzerland

After graduation from the University of Zurich with a PhD magna cum laude of the faculty of economics, business administration and information technology, Philipp worked for PwC in the Corporate Finance space, in Switzerland and the US. Subsequently he joined UBS Investment Bank in Switzerland as a project manager for Investment Banking Advisory transactions. In 1999 he re-joined PwC to take the lead of the Investment Banking Advisory business. From 2014 to 2017 Philipp built and led the PwC Corporate Finance business in the US. After returning to Switzerland he built a Private Equity fund focusing on acquisitions in the German speaking part of Europe. Since 2019 he is a Managing Partner of Finaport, a Global Wealth- and Asset Management Company in Switzerland, where he is responsible for the Investment Banking as well as for the Private Market Products businesses.



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

Roland A. Pfister studied law at the Universities of Neuchâtel and Granada. He 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. Since 2015, he works at an international corporate and tax law firm in Zurich. 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).



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, March 17th, 2020 from 1:30 pm to 6:10 pm.



Language

Due to the international content and multinational speakers and attendants, the conference will be in English and Spanish. Simultaneous translation will not be provided.



Venue

The event will be held at the hotel NH Buenos Aires 9 de Julio located on Cerrito 154, C1010 AAD, Buenos Aires. For detailed information on how to get to the venue, please visit the [website](#).



Registration

Online registration is available via email – info@exchange-ideas.com.
Registration fee (excl. VAT): ARS 4 270 (lunch not included) – Payment through Credit Card: US\$ 70.00.



Accommodation

You can book your accommodation rooms visiting the hotel’s [website](#).



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E-mail: info@exchange-ideas.com.

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