



Uruguay Tax Conference 2023

October 3rd, 2023 – Montevideo

In today's globalized and transparent world, individuals, companies and legal professionals face a set of new and demanding challenges regarding regulatory and tax compliance. Recent developments in the area of tax transparency, information exchange for tax purposes and global taxation have created a competitive landscape in which efficient compliance with tax laws is the key to success.

The Uruguay Tax Conference 2023 will discuss the most recent changes in Uruguayan tax legislation from the perspective of national and international tax law, including the analysis of comparative law in selected jurisdictions. Renowned tax law professionals and scholars will explore the key issues to ensure tax compliance within tax structuring scenarios.

The first panel of the afternoon will cover the main domestic tax aspects such as the latest legislation updates, relevant case law and other crucial topics within the tax practice including free trade zones and anti-money laundering regulations. Next, the discussion will shift to Uruguayan international tax law and will comprise crucial aspects such as the changes implemented in the passive income taxation regime, the new substance requirements that need to be met by taxpayers and recent case law defining tax residency criteria. Furthermore, the second panel of the day will also cover updates to the Uruguayan transfer pricing and tax holiday regimes as well as the status of implementation of Pillar I & II of the OECD.

The second part of the conference will have a more practical approach, addressing a variety of case studies which involve third jurisdictions that are typically considered as economic partners of Uruguay. Concretely, the speakers will present the audience with inbound and outbound investments scenarios in order to explore the tax consequences deriving from such transactions both from an Uruguayan perspective as well as from the standpoint of third countries such as: Switzerland, Liechtenstein, Argentina, Brazil and Mexico.

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13:30 Welcome and Registration

14:00 Latest Developments in Uruguayan Domestic Tax Legislation

- Latest domestic tax legislation updates
- Relevant case law
- Free trade zones – Focus on services
- Tax compliance and anti-money laundering regulations in Uruguay

Chair: Catalina Camejo (Uruguay), Speakers: Dr. Leonardo Costa (Uruguay)

14:30 Latest Developments in Uruguayan International Tax Legislation

- Amendments to passive income taxation and its impact on inbound/outbound investments to/from Uruguay
 - Law No 20.095 (December 2022)
 - New substance requirements to be considered as “Qualified Entity”
- Tax residency of individuals due to economic interests – Case law “TCA, No. 303/2022”
- Updates in Transfer Pricing
- Tax Holiday regime – Latest updates and requirements
- Status of implementation Pillar I & II
- Tax incentives to the software industry - International tax restructuring opportunities

Chair: Dr. Jonas Bergstein (Uruguay), Speakers: Fabian Birnbaum (Uruguay), Manuel Zarate (Mexico), Dr. Beat Baumgartner (Switzerland) and Leandro Passarella (Argentina)

15:30 Workshop I: Considerations for Uruguayan individuals and corporate entities doing business with Switzerland, Liechtenstein and Brazil

- Case studies: inbound scenarios (Swiss, Liechtenstein and Brazilian investors investing in Uruguay) and outbound scenarios (Uruguayan investors using Switzerland, Liechtenstein and Brazil for investment or asset protection purposes)

Speakers: Peter Grüter (Switzerland), Ralph Thiede (Liechtenstein), Frederico de Almeida Fonseca (Brazil) and Dr. Leonardo Costa (Uruguay)

16:00 Coffee break

16:30 Workshop II: Considerations for Argentine individuals and corporate entities doing business with Switzerland, Liechtenstein and Uruguay

- Case studies: inbound scenarios (Swiss, Liechtenstein and Uruguayan investors investing in Argentina) and outbound scenarios (Argentine investors using Switzerland, Liechtenstein and Uruguay for investment or asset protection purposes)

Speakers: Peter Grüter (Switzerland), Ralph Thiede (Liechtenstein), Santiago Zebel (Argentina) and Leandro Passarella (Argentina)

16:50 Workshop III: Considerations for Brazilian individuals and corporate entities doing business with Switzerland, Liechtenstein and Uruguay

- Case studies: inbound scenarios (Swiss, Liechtenstein and Uruguayan investors investing in Brazil) and outbound scenarios (Brazilian investors using Switzerland, Liechtenstein and Uruguay for investment or asset protection purposes)

Speakers: Dr. Roland A. Pfister (Switzerland/Liechtenstein), Jonas Bergstein (Uruguay) and Frederico de Almeida Fonseca (Brazil)



17:10

Workshop IV: Considerations for Mexican individuals and corporate entities doing business with Switzerland, Liechtenstein and Uruguay

- Case studies: inbound scenarios (Swiss, Liechtenstein and Uruguayan investors investing in Mexico) and outbound scenarios (Mexican investors using Switzerland, Liechtenstein and Uruguay for investment or asset protection purposes)

Speakers: Dr. Roland A. Pfister (Switzerland/Liechtenstein), Fabian Birnbaum (Uruguay), Manuel Zarate (Mexico)

17:30

Apéro and Networking

**Frederico de Almeida Fonseca | Rolim, Goulart, Cardoso Advogados | Brazil**

Frederico de Almeida Fonseca holds a Masters Degree in Tax and Corporate Law from the Milton Campos University and an LL.M. in Regulatory Law from the Fundação Getúlio Vargas (FGV Rio). He is a tax partner at Rolim, Goulart, Cardoso Advogados acting as the Head of the Tax Consulting department of the Minas Gerais branch of ROLIM, dealing with both 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.

**Dr. Beat Baumgartner | Loyens & Loeff | Zurich**

Beat Baumgartner, certified tax expert and attorney-at-law, is a partner of Loyens & Loeff since 2015. He heads the Swiss tax practice. Prior to joining the firm, Beat worked at a leading Swiss law firm and a Big Four company. Beat focuses on Swiss and international taxation, in particular tax-efficient group, investment and acquisition structures, tax-efficient business models and value chains, transfer pricing, M&A, financing and capital markets, private equity, venture capital, structured financial instruments and ultra-high net worth individuals.

**Dr. Jonás Bergstein | Bergstein Abogados | Uruguay**

Jonás Bergstein is a lawyer graduated from the University of the Republic in Uruguay, where he served as editor-in-chief of the law-journal. He holds an LL.M. from Harvard Law School, and completed foreign associate programs in WilmerHale (DC) and Mattos Filho (Sao Paulo). He is a partner with Bergstein, where he is part of the tax practice. He is an Associate Professor of Taxation at the University of the Republic School of Law and is the author of several books and law-review articles in subject of his expertise. Jonás advises clients in the wide spectrum of tax matters.

**Fabian Birnbaum | FBM Advisory | Uruguay**

Fabian Birnbaum is a Certified Public Accountant by ORT University in Uruguay. Also, he holds an LL.M. from the London School of Economics and a Postgraduate in Tax Law from ORT University. He is the founding partner of FBM Advisory where he has advised national and multinational companies across industries and participated in numerous foreign investment projects, and M&As. Fabian is a tax professor at ORT University and member of the International Fiscal Association. Dr. Birnbaum has been recognized as a Tax Leader by International Tax Review and Chambers and Partners.

**Catalina Camejo | University of Montevideo | Uruguay**

Catalina Camejo is a Certified Public Accountant by the School of Economics and Administration, Universidad de la República. She holds a master's degree in Tax Law and a Postgraduate Degree in International Tax Law, both from the University of Montevideo. She teaches at the Postgraduate Course in International Tax Law at the University of Montevideo and at the Academic Tax Unit of the School of Economics and Administration, University of the Republic. Catalina currently works in the Tax Department of the General Tax Directorate of Uruguay. Before joining the tax authorities, she worked from 1998 to 2006 in the Tax Department of PWC.

**Dr. Leonardo Costa | Brum Costa Abogados I Uruguay**

Leonardo Costa is a lawyer by the Universidad de la República, holds a master's degree from the International Tax Program of Harvard Law School and an Economic Analyst Degree from the Institute of Economic Studies of Montevideo. From 2000 to 2005, Leonardo has served as Deputy Clerk of the Presidency of Uruguay and, since then, he is a founding Partner of Brum Costa Abogados, specializing in corporate, tax and financial law and in AML and has developed several consultancies for national and foreign organizations. He is the author of various papers and articles and is professor at various graduate and post-graduate tax programs in Uruguay.

**Peter Grüter | First Advisory Schweiz AG, CH-Zurich | First Advisory Group, FL-Vaduz**

Peter Grüter studied law at the University of St. Gallen and holds a Postgraduate Degree with focus on international business law. In 2000 he joined LGT Group in Vaduz as legal counsel where he gained experience in the private banking area. Although Peter founded his own legal practice on 2011, in 2015 he joined First Advisory Group has taken over the responsibility for several markets, amongst them Latin America. His main areas of expertise include international wealth planning with a strong focus on Swiss and Liechtenstein solutions for entrepreneurial families.

**Dr. Leandro Passarella | Passarella Abogados I Argentina**

Leandro M. Passarella is a tax lawyer graduated from the University of Buenos Aires. He also holds a masters' degree and the International Tax Program certificate from Harvard Law School. He worked in the New York office of PWC to then go back to Argentina where he worked in leading tax law firms in Buenos Aires. In 2010, Leandro founded his own practice which serves Argentine and international clients in the areas of tax and corporate law. Both Dr. Passarella and his law firm have been recognized by organizations such as the International Tax Review and Client Choice Awards. He is an active member of various tax associations worldwide (IFA, IBA, AAEF) and is a professor at the postgraduate tax program of Torcuato Di Tella University.

**Dr. Roland Pfister | Badertscher Attorneys at Law I Switzerland**

Dr. Roland A. Pfister studied law at the Universities of Granada and Neuchâtel, where he obtained a Ph.D. in international tax law and holds an Executive MBA in Wealth Management from the University of Liechtenstein. He is a Tax Counsel for an international corporate and tax law firm with offices in Zurich and Zug and his practice focuses on domestic Swiss and Liechtenstein as well as international tax law, with a particular emphasis on tax-compliant wealth planning for high net-worth individuals, corporate entities and family offices (including funds, trusts and partnerships). Dr. Roland A. Pfister is member of various Boards of Directors and Boards of Foundation and lectures at the Lucerne University of Applied Sciences and Arts.

**Ralph Thiede | First Tax Trust reg. | Liechtenstein**

Ralph Thiede studied law at the University of Fribourg and is a Certified Swiss Tax Expert. He has worked for 'Big 4' consulting firms in St. Gallen and Zurich. From 2011 to 2017, he was responsible for the set-up of the national and international tax services at one of the big trust firms in Liechtenstein, to later on join First Advisory Group in 2018. Ralph's main areas of expertise cover cross-border tax advice for wealthy families and corporate clients with a focus on Swiss, Liechtenstein and international tax law, CRS optimized structures holding business assets and tax-efficient structuring of complex family and business assets.

**Jose Manuel Zarate Nicolas | Andersen | Mexico**

Manuel Zarate, is a Tax Director at Andersen Mexico. He has over 19 years of experience in Corporate and international tax. He advises individuals, companies and groups that are listed on the Mexican Stock Exchange, with national and international investments. His broad experience includes providing tax advice to clients in different industries, including energy oil and gas, TMT, advertising, manufacturing, pharmaceutical, mining, logistics, e-commerce, construction, hotels, among others.

**Santiago Zebel | Corag Group | Argentina**

Santiago Zebel holds a master's degree in Tax Law from Universidad Di Tella. He is Managing Director of Argentina & Uruguay offices of Corpag Group, a corporate and trust services company with presence in over 20 countries. Santiago is also director of Executive Legal Education and professor of Tax Law at Universidad Di Tella in Argentina. Santiago has worked for recognized law firms in Argentina within the tax practice and was an associate consultant for the United Nations. Author of various publications and speaker at numerous conferences, Santiago Zebel is often quoted by the international press (CNN, The Economist) and in 2013 was chosen by Apertura Magazine as one of the 30 leading Argentines of his generation



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

Tuesday, October 3rd, 2023 from 1:30 pm to 6:00 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 Montevideo (Dir. Jose Benito Lamas 2901, Montevideo). For detailed information on how to get to the venue please visit the venue [website](#).



Registration

Online registration via Exchange Ideas’ [website](#).
Registration fee for infrastructure costs (excl. VAT): **USD 70** (lunch not included)
A certificate of attendance will be issued to all attendees.



Accommodation

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



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