



Holding Regimes

The competitors' arguments for best holding Jurisdiction in and out of Europe



Conference Chairman

Dr Ramona Piscopo
International Tax Lawyer
Loyens & Loeff

27 January 2009
Warwick Hotel
14, Rue de Lausanne
1201 Geneva - Switzerland

Speakers

Dr Ramona Piscopo (Malta)
International Tax Lawyer; **Loyens & Loeff**

Mr Pierre Kreemer (Luxembourg)
Partner; **KPMG Tax**

Mr Enrico Schoonvliet (Belgium)
Partner; **Loyens & Loeff**

Mr Chris Leenders (Netherlands)
Koenen en Co

Mr Arjan Schaapman (Cyprus)
Managing Director; **Vistra (Cyprus) Ltd**

Mr Paul Smith (United Kingdom)
Director, International Tax Service Group;
Grant Thornton UK LLP

Mrs Liesl Fichardt (United Kingdom)
Partner; **Berwin Leighton Paisner**

Mr Olaf Meyer (Switzerland)
Bern University of Applied Sciences

Mr Marko Gründig (Germany)
Partner, International Corporate Tax; **KPMG AG**

Programme

09:00 Welcome speech and introduction

Dr Ramona Piscopo (Malta)
International Tax Lawyer, **Loyens & Loeff**

09:10 Holding company structures and recent developments in Luxembourg

- Update on relevant Luxembourg tax rules for holding company structures
- Practical examples of holding/financing structures involving Luxembourg

Mr Pierre Kreemer (Luxembourg)
Partner, **KPMG Tax**

09:50 Belgium : innovative tax measures for holding structures

- Tax regime applicable to dividends and capital gains
- Exemption of dividend withholding tax

Mr Enrico Schoonvliet (Belgium)
Partner, **Loyens & Loeff**

10:30 Coffee break

11:00 Dutch Tax Implications of Holding Structures

- Holding companies and the participation exemption
- Advance rulings
- Tax consolidation (fiscal unity)
- Use of Dutch holding companies in mergers and acquisitions

Mr Chris Leenders (Netherlands)
Koenen en Co

11:40 Malta's Holding Regime

- Overview of Malta's corporate tax system
- Recent developments
- Practical uses of Malta as a holding jurisdiction

Dr Ramona Piscopo (Malta)
International Tax Lawyer, **Loyens & Loeff**

12:20 Lunch

14:00 Cyprus' Holding regime

- Main features of the Cypriot Corporate Income Tax system
- Developments since EU Accession
- Advantages of using Cypriot Holding Companies

Mr Arjan Schaapman (Cyprus)
Managing Director, **Vistra (Cyprus) Ltd**

14:40 Comparison of other continental European regimes

- Austria
- Central European Countries
- Denmark
- Ireland
- Spain
- Switzerland
- United Kingdom

Mr Paul Smith (United Kingdom)
Director, International Tax Service Group, **Grant Thornton UK LLP**

15:20 Coffee Break

15:35 Overview of the Relevant German Tax Rules for Holding Companies

- Dividends, Capital Gains
- Tax consolidation

Taxation of Foreign Income and Foreign Dividends in Specific Situations

- Dividends, Capital Gains

Mr Marko Gründig (Germany)
Partner, International Corporate Tax, **KPMG AG**

16:15 EU case law

- ECJ cases and impact in the UK
 - Cadbury Schweppes - controlled foreign company regime
 - Franked Investment Income GLO - credit or exemption method
- UK reaction to ECJ cases:
 - More complex legislation
 - Proposals on taxation of foreign profits / CFC regimes
- Lessons for holding company regimes
 - Exit from the UK?
 - UK Exit tax and its apparent unlawfulness

Mrs Liesl Fichardt (United Kingdom)
Partner, **Berwin Leighton Paisner**

16:30 Taxation risk of dividends and interests paid to non European residents

- European directives: spirit and limits
- The importance of local legislation
- A practical case

Mr Olaf Meyer (Switzerland)
Bern University of Applied Sciences

16:50 Debate

17:20 Close of the conference

Financial Events *International*

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