

Smart Tax Planning

Tax efficient structures in the European Union and outside

18th & 19th November 2008, Epsom hotel, ^{****} Geneva

Conference Chairman

Dr Ludovic Verbist (Switzerland)
Managing Director
AAMIL Ltd



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Managing Director;
AAMIL Ltd

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Tax Lawyer;
Vanhaute & Co.

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Attorney at Law;
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Ms Inbal Faibish (Switzerland and Israel))
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International Tax Consultant;
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Mr Auke von der Horn (Netherlands)
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Mr David Ashton (Switzerland)
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Mr Petros Rialas (Cyprus)
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Head of Trust & Corporate Department;
Totalserve Management Ltd

Dr Jeanette Wibmer (Switzerland)
Partner, Attorney at law;
Klein Attorneys Ltd

Mr Clayton Bonnette (United Kingdom)
Senior Associate;
Maitland Group

Partners

November 18th 2008

09:00 Chairman's welcome & opening remarks

09:10 Introduction

- Relevance of tax planning
- Its importance and necessity
- Internationalisation / Globalisation
- Double Taxation Agreements
- European Directives

Dr Ludovic Verbist (Switzerland)
Managing Director
AAMIL Ltd

10:10 Coffee break

Residency

10:30 Belgium as an ideal residence country for high net worth individuals

- Absence of wealth tax, no capital gains taxation, personal investment income taxed at flat rates
- Tax planning opportunities
- Belgian foundations, international income tax planning opportunities

Mr. Patrick Vanhaute (Belgium)
Tax Lawyer
Vanhaute & Co.

Co-founder of the European Tax Intelligence Group (ETIG)
Contributing author to IBFD's International Guide to the Taxation of Holding Companies

11:00 Residency in Mauritius

- GBL1 work permit
- Investment of US\$ 500,000
- As retired
- Purchase of IRS
- Different tax situations

Mrs Cécile Civiale Vuillier (Switzerland)
Manager
AAMIL (Swiss) SA

11:30 Residency in the United Kingdom

- Residence - the statutory rule and the extended
- Residence and domicile and the significance scope with reference to practice and case law (IR20) thereof in the context of the direct taxes
- The position post 'Gaines-Cooper'
- The remittance basis and the developments proposed post the 2007 Pre Budget Report
- Ordinary residence and earned income

Ms Lara Arnold (United Kingdom)
International Tax Consultant;
IFS Corporate Services

Mr Clayton Bonnette (United Kingdom)
Senior Associate;
Maitland Group

12:00 Residency in Switzerland

Ms Inbal Faibish (Switzerland and Israel)
Associate
Rosenberg, Keren-Polak & Co., Advocates
Dr Jeanette Wibmer (Switzerland)
Partner, Attorney at law
Klein Attorneys Ltd

12:30 Lunch

Trading companies

14:00 Trading companies in Luxembourg

- Forms of commercial companies
- Business permits
- Tax issues
- Social security issues

Mr Bernard Felten (Luxembourg)
Attorney at Law
Felten & Associates

14:25 Trading companies in Mauritius

- The IBC type structure
- Tax issues
- Operational aspects
- Control and management

Mrs Cécile Civiale Vuillier (Switzerland)
Manager
AAMIL (Swiss) SA

14:50 Trading companies in the United Kingdom

- Incorporation and compliance
- Trading with as opposed to within the UK
- Central control and management
- Permanent establishments
- Inward investment into the UK (including the corporate venturing scheme)
- E-Commerce

Ms Lara Arnold (United Kingdom)
International Tax Consultant;
IFS Corporate Services

Mr Clayton Bonnette (United Kingdom)
Senior Associate;
Maitland Group

15:15 Coffee break

Yachts and aircraft registration

15:30 The Isle of Man: Europe's offshore location for the registration of yachts and aircraft - VAT savings potential

Mr David Ashton (Switzerland)
Managing Director
ILS Fiduciaries (Switzerland) SARL

16:00 Yachts and aircraft registration in Malta

- The Maltese ship registration system
 - Commercial and private yachting registration
 - The benefits of leasing and other structures
 - Tax & VAT treatment
- The aircraft register
 - Business and private aircraft
 - Business aviation and its potential in Malta
 - Tax treatment and other

Dr Tonio Fenech (Malta)

Partner

Fenech & Fenech Avocates

16:30 Cocktail

November 19th 2008

09:00 Chairman's welcome & opening remarks

Dr Ludovic Verbist (Switzerland)

Managing Director

AAMIL Ltd

Holding regimes

09:10 Use of Belgian holdings for private wealth management

- Advantages/disadvantages
- Impact of the national interest deduction (NID)
- Case by case
- Withholding tax aspects

Mr. Patrick Vanhaute (Belgium)

Tax Lawyer

Vanhaute & Co.

Co-founder of the European Tax Intelligence Group (ETIG)

Contributing author to IBFD's International Guide to the Taxation of Holding Companies

09:40 Holding regime in Luxembourg

- SOPARFI versus SPF

Mr Bernard Felten (Luxembourg)

Attorney at Law

Felten & Associates

10:10 Holding regimes in Cyprus

- Cyprus tax system at a glance
- Cyprus tax provisions specifically relating to holding/financing companies
- International tax planning via Cyprus
- Latest developments

Mr Petros Rialas (Cyprus)

Tax Consultant

Head of Trust & Corporate Department

Totalserve Management Ltd

10:40 Holding regime in Mauritius and the Seychelles

- GBL1 company
- Double taxation agreements
- Tax issues
- Examples of uses

Dr Ludovic Verbist (Switzerland)

Managing Director

AAMIL Ltd

11:10 Coffee break

11:30 Holding regime in the United Kingdom

- Transfer pricing
- Thin capitalisation
- Cross-border tax arbitrage
- The effect of withholding taxes
- CFC's
- Relief for substantial shareholding

Ms Lara Arnold (United Kingdom)

International Tax Consultant;

IFS Corporate Services

Mr Clayton Bonnette (United Kingdom)

Senior Associate;

Maitland Group

12:00 Main aspects of the Dutch Holding Regime

- The participation exemption
- No or low withholding tax rates on incoming and outgoing dividends
- Absence of withholding tax on outgoing interest and royalties
- Possibility of tax reporting in the group's functional currency (like USD or GBP)
- An advance tax ruling system
- Excellent infrastructure

Mr Auke von der Horn (Netherlands)

Tax Lawyer

CMS Derks Star Busmann

12:25 Synthesis and question time

12:40 Lunch

Investment funds

14:00 Investment funds in Mauritius

- Setting up
- Conditions to fulfill
- Practical considerations

Mrs Cécile Civiale Vuillier (Switzerland)

Manager

AAMIL (Swiss) SA



14:30 Investment funds in Luxembourg

- SICAV/FCP
- SICAR
- Specialized Investment fund

Mr Bernard Felten (Luxembourg)
Attorney at Law
Felten & Associates

Trademarks, royalties, patents

15:00 The Paris Convention

Mr Alexandre Weith (Switzerland)
Senior Partner
Cabinet Bugnion

15:20 Coffee Break

15:40 The new Luxembourg IP regime

- The Law of 21 December 2007
- 80% exemption on (certain) income from IP

Mr Mario Di Stefano (Luxembourg)
Senior Partner
Di Stefano, Sedlo & Moyses

16:00 Trademarks, royalties, patents in the Netherlands

- Special regime for income from patents
- Optional (upon request of the taxpayer)
- Effective rate 10%
- Profit to be taxed at 10% is limited to 4 times the total R&D costs
- Netherlands Antilles /SPF

Mr Auke von der Horn (Netherlands)
Tax Lawyer
CMS Derks Star Busmann

16:20 The use of UK and Irish structures for tax efficient royalty routing

Mr David Ashton (Switzerland)
Managing Director
ILS Fiduciaries (Switzerland) SARL

16:40 Chairman's closing comments

Financial Events *International*

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