



International Tax Planning Post Holding 1929 Regime

27th March 2007, Crowne Plaza Hotel*****, Geneva



Conference Chairman

Patrick Vanhaute

Tax Lawyer

P. Vanhaute BVBA

International tax planning is getting more and more difficult. Several recent decisions from both the European Commission and other official bodies have upset many set rules.

Consequently, many tax schemes have to be completed or restructured. Among the main changes:

- The decision of the EU Commission of July 2006 modifies the preferential regime in favour of the Luxembourg Financial holdings 1929.
- The Agreement reached between the Government of Malta and the EU Commission in relation to Maltese International Trading Companies and International Holding Companies
- Recent ECJ Decisions and their impact on the use of holding companies in international tax planning. Eight of those decisions are essential. Each party involved should know them and have them analysed.
- The recent formal request sent by the European Union to several European countries to request the end of its discriminatory taxation of dividends paid to foreign companies.
- The Ruling of EU Commission: Belgian Coordination Centres constitute forbidden state aid and the introduction of the National Interest Deduction in Belgium.
- The Dutch Corporate Income Tax Reform 2007
- Tax Treaty Developments

The conference will also focus on an in-depth analysis of (types of corporate vehicles, incorporation procedures, taxation) the attractiveness of some non EU countries namely: Switzerland, Seychelles, Mauritius, Singapore, Hong-Kong.

InternationalTax
REPORT
The monthly guide to international tax planning

Rivista
TRUST&TRUSTEES
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Speakers

Mr Patrick Vanhaute (Belgium)
Tax Lawyer; **P. Vanhaute BVBA**

Mr Bernard Felten (Luxembourg)
Attorney at law; **Felten & Associés**

Mr Arjan Schaapman (Cyprus)
Founding Partner; **CS ACSA Ltd**

Mr Koen Lozie (Luxembourg)
Managing Director; **Aver Trustees**

Dr Anthony Cremona (Malta)
Senior Associate; **Ganado & Associates**

Mr Jochem De Koning (Netherlands)
Tax Partner; **CMS Derks Star Busmann**

Mr Pat O'Brien (Ireland)
Partner; **KPMG Dublin and New York**

Dr Ludovic Verbist (Switzerland)
Managing Director; **Aamil Ltd**

Programme

09:00 Welcome speech and introduction

Mr Patrick Vanhaute (Belgium)
Tax Lawyer; P. Vanhaute BVBA

With the collaboration of Buntinx, Berckmans Advocaten

09:30 The Luxembourg alternative after the Holding 1929 regime

- Holding 1929 versus European Commission
- Existing Holding 1929 : the transitory regime
- The alternative : SOPARFI, Investment Funds, SICAR, Securitisation, S.I.F and S.P.F

Mr Bernard Felten (Luxembourg)
Attorney at law; Felten & Associés

10:15 Tax structuring opportunities of Cyprus after EU accession

- Cyprus General
- Description of tax system in Cyprus
- Structures for which the use of Cyprus can be beneficial

Mr Arjan Schaapman (Cyprus)
Founding Partner; CS ACSA Ltd

11:00 Coffee Break

media|partner

L'AGEFI

La couleur de l'économie.

11:30 Malta uncovered: What you may not know about Malta

- What makes an estate planner tick about Malta
- Privacy
- The name of the game: Integrity
- Family Partnerships
- Professional Investor Funds
- Re-Domiciliation of Companies
- The Maltese branch route

Mr Koen Lozie (Luxembourg)
Managing Director; Aver Trustees

Dr Anthony Cremona (Malta)
Senior Associate; Ganado & Associates

12:30 Lunch

14:00 Changed rules and new opportunities in the Netherlands

- Holding structures: revised participation exemption
- Tax exempt investment institutions
- Tax exempt Antilles foundation for individuals

Mr Jochem De Koning (Netherlands)
Tax Partner; CMS Derks Star Busmann

14:45 Why Irish eyes are smiling?

- Holding company legislation in Ireland
- EU developments affecting Ireland
- DTA network and “treaty shopping”
- Foreign investment in Ireland

Mr Pat O'Brien (Ireland)
Partner; KPMG Dublin and New York

15:30 Coffee Break

16:00 Optimizing the notional interest deduction and the participation exemption in international tax planning

- Belgium in international tax planning in light of the recently introduced notional interest deduction
- Belgium tax treaty policies towards Hong Kong and the U.A.E.
- Belgian holding and finance companies

Mr Patrick Vanhaute (Belgium)
Tax Lawyer; P. Vanhaute BVBA
With the collaboration of Buntinx, Berckmans Advocaten

16 :45 Attractiveness of some non-EU countries:

- Switzerland, Seychelles, Mauritius, Singapore, Hong-Kong
- A comparison:
 - Environment
 - Types of corporate vehicles
 - Incorporation procedures
 - Taxation: corporate, withholding taxes, capital gains
 - Double taxation agreements
 - Some examples of uses

Dr Ludovic Verbist (Switzerland)
Managing Director, Aamil Ltd

17:15 Close of the conference

Financial Events *International*



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27th March 2007, Crowne Plaza Hotel, 34 Route François Peyrot, Geneva, Switzerland

Please contact us for special hotel rates – e-mail: l.plumet@financial-events.ch

Registration fee: 849 € / 1360 CHF / 1100 \$ / 570 £

10% discount if registration by January 20th, 2007

A discount of 30% is granted to the second and any additional registration from the same institution

Please register the following delegate for this conference:

Name :

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