

International Tax Seminars

*Understanding Current Tax Practice
& Planning Opportunities In:*

- UK
- USA
- Germany
- France & Italy
- European Holding & Financing Regimes

European Holding & Financing Regimes:

- Ireland
- Netherlands
- Luxembourg
- Malta
- Madeira
- Cyprus
- Denmark
- Spain
- Switzerland
- Austria
- Central European Countries

Presented by expert speakers from:



Deloitte.



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17th - 21st May 2010, etc Venues - The Hatton, London

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International Tax Seminars 2010

17th - 21st May 2010, etc Venues - The Hatton, London

Good morning,

As a result of globalisation and increased cross border activity, more companies are operating their business within more than one country.

Consequently, multinational tax professionals will not only need a comprehensive knowledge of tax regulations within the company's 'home' country, but also an understanding of the tax and compliance legislation in other economic environments.

Over the past decade, to help meet the growing need for international tax updates, IIR has developed a unique package of Tax Seminars, specifically designed to provide international tax directors, managers and accountants with a detailed understanding of individual tax systems and strategic tax territories within Europe.

The 17th instalment of the series of seminars will take place as follows:

- | | |
|--|-------------------------|
| 1. Taxation of UK Companies | Monday 17th May 2010 |
| 2. Taxation of French & Italian Companies | Tuesday 18th May 2010 |
| 3. Taxation of German Companies | Wednesday 19th May 2010 |
| 4. Taxation of US Companies | Friday 21st May 2010 |

Plus, a concise and thorough round-up of
strategic planning opportunities afforded to tax professionals:

5. **European Holdings & Financing Regimes** - Thursday 20th May 2010

Updated to include coverage of: Ireland, Netherlands, Luxembourg, Austria,
Madeira, Cyprus, Malta, Denmark, Spain & Switzerland

What you can expect from each International Tax Seminar:

- An overview of the structure and key features of individual national tax environments
- A detailed comparison of planning opportunities and tax pitfalls afforded by different tax regimes
- Important ideas on new tax planning specifics
- A focus on both inbound and outbound investments
- An insight into tax efficient investment planning
- Information that can be cross-referenced between the other seminars
- Comprehensive documentation provided
- Plenty of real-world examples

I look forward to meeting you in May!

Kind regards,

Michele Costa

Michele Costa, Conference Director, IIR & IBC Conferences

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European Holding & Financing Regimes

Thursday 20th May 2010, etc Venues - The Hatton, London

09:00	Chairman's Welcome & Introduction <ul style="list-style-type: none">■ Review of today's programme■ Important international developments for holding and finance companies■ Opportunities to use holding and finance companies to minimise global taxes	12:30	Lunch
09:10	The Future of International Financing in the UK <ul style="list-style-type: none">■ Historic approach■ Impact of the proposed legislation on the taxation of Foreign Profits■ Update on other anti-avoidance including avoidance involving tax arbitrage■ Where next? Kate Alexander <i>Director, International Tax Services</i> ERNST & YOUNG	13:30	Ireland <ul style="list-style-type: none">■ How the 12.5% tax regime operates■ Impact of recent reforms on holding companies in Ireland■ Using Ireland in international financing structures■ Ireland's new transfer pricing rules Peter McGeoghegan <i>Tax Manager</i> DELOITTE (IRELAND)
10:15	Coffee	14:30	Madeira: a Competitive and Credible Tax Planning Jurisdiction <ul style="list-style-type: none">■ The main aspects of Madeira's tax regime■ Madeira for service oriented companies■ The Madeira holding regime■ The low VAT advantages Pedro Fugas <i>Senior Tax Manager</i> ERNST & YOUNG (PORTUGAL)
10:30	UK Tax Implications of Holding & Financing Structures <ul style="list-style-type: none">■ Double tax relief opportunities■ Minimising the impact of controlled foreign company provisions■ Ensuring appropriate Treasury consents are obtained Gareth Amdor <i>Partner</i> SJ BERWIN LLP	15:30	Coffee
11:30	The Netherlands and Luxembourg as Holding Company Regimes <ul style="list-style-type: none">■ Participation exemption■ Ruling practice■ Deductibility of interest■ Beneficial ownership and tax treaties■ Exit strategies Willem Bon <i>Partner</i> LOYENS & LOEFF	15:45	Comparison of Other Continental European Regimes <ul style="list-style-type: none">■ Austria■ Central European countries■ Malta■ Cyprus■ Denmark■ Spain■ Switzerland Paul Smith <i>Client Service Director</i> GRANT THORNTON UK LLP
		16:30	Close of Day

YOUR EXPERT SPEAKERS

Kate Alexander is a Director in Ernst & Young's London-based International Tax Services Group, which provides tax consultancy services to a wide range of UK and foreign-based multinational companies. She has 12 years' experience advising clients on international tax matters. Kate advises on all aspects of international tax planning, assisting multinational groups to manage their global tax cost. Her specialist areas of expertise include structuring international acquisitions and disposals, cross border financing, together with UK double taxation relief and controlled foreign companies planning. She is a regular speaker on international tax issues.

Gareth Amdor is a tax partner at SJ Berwin LLP. He has significant experience advising on all aspects of corporate and indirect tax as well as employee incentivisation and taxation. In particular, Gareth is one of the main corporate transactional tax partners and advises on UK and cross border M&A - involving public companies, private limited companies and private equity houses - in addition to advising on corporate finance transactions and corporate restructurings. Gareth also has significant experience advising on all aspects of UK and international employee share, and share option, plans as well as UK and cross border employment tax and social security issues. In addition, Gareth advises on the tax aspects of real estate transactions including European property funds

Willem Bon, tax lawyer and partner at Loyens & Loeff, heads the international tax practice of the London office. He acts as Dutch tax counsel in M&A, structured finance transactions and securitisations. His clients include Dutch and foreign multinationals, funds and high-net-worth individuals. Willem is a member of the Dutch Association of Tax Advisers (NOB), the International Fiscal Association (IFA) and International Bar Association (IBA). He graduated cum laude in Dutch law at the University of Utrecht in 1987 and has since worked for Loyens & Loeff.

Paul Smith is a Client Service Director in the International Tax department of Grant Thornton UK LLP in London. Prior to joining Grant Thornton, Paul spent six years as the European Tax Director of Prudential Financial Inc. group. The principal activities of the group consisted of private banking, broker dealing, global derivatives, private equity and asset management and Paul was involved in all aspects of managing the international tax affairs of the group in Europe. Before joining the Prudential group, Paul spent five years as the Group Tax Manager at Allied Domecq PLC and prior to this he was with KPMG in London, having also spent two years working in the New York office as a senior tax manager.

Pedro Fugas has eight years of experience in international corporate taxation matters, international planning, group's restructurings, mergers and acquisitions and corporate law. Between October 2006 and July 2008 he headed the Portugal, Malta and Cyprus Tax Desk in Ernst & Young's New York office, advising multinational companies in international tax planning, with a focus on U.S. investments in Portugal and through-bound investments via the Madeira International Business Centre. His professional experience also includes outbound tax planning for Portuguese corporations, Portuguese tax consulting, tax planning and tax compliance for local and inbound clients. He specializes in international corporate taxation matters, international planning, group's restructurings, mergers and acquisitions and corporate law.

Peter McGeoghegan is a Tax Manager in Deloitte Dublin Financial Services Tax department specialising in the areas of insurance, banking and structured finance, leasing, investment management and funds. His work involves advising both Irish and multinational companies on Irish and international tax issues. Peter is a member of the Institute of Chartered Accountants in Ireland (ICAI) and a member of the Irish Taxation Institute (ITI).

Due to unforeseen circumstances, the programmes may change and IIR reserve the right to alter the venue and/or speakers

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