



# 2017 PARIS TAX CONFERENCE

25 October 2017 – Paris

In today's tax transparent and globalized world, wealth owners and their advisors face a set of new and demanding regulatory and tax compliance challenges. Recent developments in the area of tax transparency and exchange of information for tax purposes have created a competitive landscape in which efficiently complying with tax laws is a key to success.

The 2017 Paris Tax Conference will discuss the most recent developments in French tax law, both from a domestic tax law perspective, as well as from an international comparative law point of view for selected jurisdictions. Outstanding tax practitioners and scholars will explore the key issues to succeed in a tax transparent world structuring cross border tax-compliant planning, focusing on the recent developments in France after the new president took office. Special consideration will be given to the implications of these changes for Switzerland, Liechtenstein, the United Kingdom, and Luxembourg. Further, the discussion will focus on tax-compliant planning alternatives for French individuals and corporations from an inbound and outbound multijurisdictional perspective, emphasizing on strategies offered by the United Kingdom, Luxembourg, Switzerland and Liechtenstein.

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# PROGRAM

08:00 Coffee and welcome breakfast

08:45 Welcome remarks

09:00 **Key to success in a tax transparent world structuring cross border tax-compliant planning**

- **Tax environment changes in France under President Macron.**
  - Perspectives and tax environment changes.
- **Implications for Switzerland, Liechtenstein, United Kingdom, and Luxembourg.**
- **Tax environment outlook of:**
  - **Switzerland** (most recent case law on exchange of information issues between CH and FR, Swiss Corporate Tax Reform with particular focus on the abolition of the special tax regimes, recent modification of lump sum taxation, exchange of rulings, etc.).
  - **Liechtenstein** (substance requirements, new rules regarding place of effective management, spontaneous exchange of information, taxation of block chain related topics, trusts, protected cell company, financing company, recent court decision regarding private asset structure).
  - **United Kingdom** (tax environment changes in the United Kingdom in light of Brexit including adoption of existing EU principles into UK domestic law, recent BEPS changes and the UK Courts' response to tax avoidance and tackling tax evasion through General Anti-Avoidance Rule ("GAAR"), Advanced Payment Notices (APNs) and increased penalties. Dealing with tax evasion. Update on tax disclosure facilities in advance of failure to correct regime in 2018 as well as the recently enacted corporate offence of facilitating evasion.
  - **Luxembourg** (recent developments in Luxembourg tax law, exchange of information, tax rulings, the importance of substance etc.)

*Speaker: Roland Pfister, David Maria, Anthony Rose, Thierry Obrist, Michel Collet and Jérôme Barré*

09:50 **Tax-compliant planning strategies for French individuals and corporations from an inbound and outbound perspectives, offered by the United Kingdom, Luxembourg, Switzerland, and Liechtenstein.**

- Case 1: French tax-resident family holding movable assets (shares, bonds and liquidity).
- Case 2: French tax-resident family holding real estate in France and abroad.
- Case 3: French Exit taxation regarding relocation issues for individual and corporate French tax-residents
- Case 4: French succession and gift tax issues regarding individual tax-resident families
- Case 5: French corporations holding qualified participations and movable assets.

*Speaker: Roland Pfister, David Maria, Anthony Rose, Thierry Obrist, Michel Collet and Jérôme Barré*

11:30 Conclusion and final remarks



# SPEAKERS BIOGRAPHY



## **Dr. Roland A. Pfister | Badertscher Attorneys at Law | Lucerne University of Applied Sciences and Arts**

Roland Pfister studied law at the Universities of Neuchâtel and Granada. After graduating from law school, he worked for an international law firm in Belgium and a leading investment bank in Zurich. Later, Roland joined the tax department of one of the "Big Four" firms in Zurich/Geneva. From 2011 to 2014, he worked at a law firm in Geneva. As of 2017, he works at an international corporate and tax law firm in Zurich/Zug. In addition, he holds an Executive MBA in Wealth Management and was a Visiting Researcher at Harvard Law School. In 2016, he attained his PhD in international tax law from the University of Neuchâtel. He is a regular contributor to tax journals and lectures frequently in postgraduate tax programs. His main areas of expertise include both domestic Swiss and Liechtenstein as well as international tax law with a particular emphasis on tax-compliant wealth management and planning for high net-worth individuals and corporate entities (including funds, foundations, trusts and partnerships). Furthermore, his practice focuses on the taxation of international investment structures (in particular private equity structures) for private and institutional investors.



## **David Maria | Tax Partner at Wildgen**

David Maria is the head of the tax practice group at Wildgen Luxembourg Law Firm. David advises an international client portfolio on corporate tax and corporate law, emphasising on M&A transactions, company reorganisation and relocation, corporate financing and wealth planning for high net-worth individuals and corporate entities. Furthermore, his practice focuses on the taxation of international investment structures (particularly on private equity structures) for private and institutional investors. David is a regular contributor to tax publications and a frequent lecturer at conferences in Luxembourg. He is a member of the International Fiscal Association and represents Luxembourg within the Energy Law Group (ELG). David is recognized by major league tables including Legal 500 and Chambers Europe. Prior to joining Wildgen, David worked with law firms and "Big Four" firms in Luxembourg and London, where he assisted private equity houses, investment funds, multinational corporate groups and high net worth individuals.



## **Anthony Rose | Tax Partner at Simmons Gainsford Group LLP**

Anthony Rose is both a Chartered Accountant and Chartered Tax Adviser with over 20 years of professional practice experience. Being trained at a small accountancy firm in London, he joined Vantis PLC in 2004, a then Top 15 UK accounting firm and specialised in tax planning structuring for medium sized businesses and their owner managers. He has since gained over 13 years of experience dealing with all technical aspects of Employee Benefit Trusts, including spending the last 6 years involved with a significant number of tax settlements for these structures. In 2009, he joined two former work colleagues to establish a boutique tax consultancy firm, Intelligent Tax Solutions LLP. There, Anthony was a managing partner until 2014, when the business was merged with Simmons Gainsford LLP. SG is a top 50 UK accountancy firm with offices in Central London, Dubai and Gibraltar. Anthony is one of the Tax Partners at SG and currently represents corporate clients and private individuals in complex tax disputes. Anthony also has a wide experience on residence, domicile and offshore and international tax structuring and families with residence non-domiciled (RND) status. He also provides ad hoc support in these areas to other accountants, lawyers and financial advisers.



# SPEAKERS BIOGRAPHY



## **Prof. Thierry Obrist | LE/AX Avocats | University of Neuchâtel**

A full Professor of tax law at the University of Neuchâtel, Thierry Obrist has a vast expertise in Swiss and international taxation, dealing with relocation of individuals and corporations and advising MNEs, SMEs and start-ups. Thierry worked for many years in Zurich with WalderWyss Ltd, a renowned law firm which is the second largest in Switzerland by the number of employees before he started his own law firm LE/AX Avocats in 2016. Thierry focuses on the taxation of employee stock options plans, mergers and acquisitions and more recently on the taxation of virtual currencies (ICO included). He also advises family offices and individuals on inheritance tax law and planning, but also with regards to real estate taxation. Thierry Obrist studied law at the University of Basel, Fribourg and Milan. He passed the bar exam in the canton of Bern and obtained a LL.M. in international taxation and a PhD in tax law from the University of Neuchâtel. He speaks fluently German, Italian and French, languages in which he regularly published scientific articles and books.



## **Michel Collet | CMS Legal**

Michel Collet began his career in 1993 at CMS's corporate tax group. In 2000, he joined Linklaters (Paris and London). From 2002 to 2007, Michel returned to CMS, to chair the tax practice in the New York office. As a member of the international tax group, Michel advises on merger and acquisitions, cross-border restructuring, corporate finance and real estate. Michel represents multinationals, funds (including sovereign), financial institutions, States and independent territories. He also advises high-net-worth individuals (including sportsmen and artists) on international planning. He is also active in litigation and audits. In addition, Michel is an active member of the American Bar Association (ABA), the International Bar Association (IBA), the International Fiscal Association (IFA) and the Tax Review. Michel regularly writes articles in Tax Note International, Euromoney and French publications such as Les Echos. From 1998 to 2000, he was a former lecturer on international/European taxation and corporate tax at Paris Dauphine University. Michel holds a postgraduate degree in international tax law from the University of Paris XI/HEC.



## **Jérôme Barré | Franklin**

Jérôme Barré leads the Patrimony and Family Business practice as well as the firm's Family Office at Franklin. After working in the legal and financial department of the Axa Group, the Tax Department of the National Federation of Agricultural Credit and the National Confederation of Mutual Credit and leading the family wealth management department of several international law firms, Jérôme joined Franklin in 2006. Jérôme represents several clients in tax litigation and tax audits, on both domestic and international tax matters. In particular, Jérôme advises individuals and family businesses on asset restructuring. Jérôme graduated from the University of Paris II Panthéon Assas with a B.A. (*Maîtrise*) in Business Law, he attended the University of Paris I Panthéon Sorbonne, where he obtained a postgraduate degree (*D.E.S.S.*) in Business and Tax Law and the University of Paris V Malakoff, where he attained a further postgraduate degree (*D.E.S.S.*) in Applied Tax.



# DETAILS

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](mailto:info@exchange-ideas.com)



## Date & Time

Wednesday, 25 October 2017. From 08:00 am to 11:30 am (registration includes a light breakfast)



## Language

Due to the international content and multinational speakers and attendants, the conference will be in the English and French languages. No translation will be provided.



## Venue

The event will be held at the Meliá Paris La Défense. For detailed information on how to get to the venue please visit the venue website: <https://www.melia.com/en/hotels/france/paris/melia-paris-la-defense/index.html>



## Registration

Online registration is available via the following link: <http://www.cvent.com/d/w5qbv9/4W>  
Registration fee: Members € 140, Non-Members € 180 (excl. VAT)



## Accommodation

Preferential accommodation rates have been negotiated with the Meliá Paris La Défense. Single standard rooms are available from € 255 (incl. VAT). You can book your accommodation rooms directly with your online event registration.



## Contact Us

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