

UK CLIENTS & FISCAL TRANSPARENCY

UNDERSTANDING THE NEW RULES:

Rubik, Swiss-UK DTA, cross border conditions, revised EU savings tax directive.

ANTICIPATING THE TAX REFORMS IN THE UK

on residents non-doms and on tax evasion

EXPLORING THE COMPLIANT TAX PLANNING SOLUTIONS

for the declared UK clients.

8.45 |

Opening speech by the conference chairman

9.00 | **Mark Morris**, Mark Morris Consulting, Zurich

THE NEW LEGAL FRAMEWORK APPLICABLE TO UK CLIENTS

Rubik agreement with the UK and the revised EU Savings Tax Directive:

How does it work? What consequences and opportunities in terms of tax planning?
Why the revised EU Savings Tax Directive is incongruent with the Rubik agreement: how it tackles all tax planning strategies

Consequences for fiduciary arrangements (trusts, foundations & establishments)

Consequences for offshore and onshore entities (international business companies, EU domestic companies)

Consequences for life insurance wrappers

10.10 |

Coffee break

10.40 | **Sandrine Giroud**, Attorney-at-Law, Lalive, Geneva

How the Swiss-UK DTA clauses on exchange of fiscal information is applied?

Identification of relevant persons and exchange of information: The particular case of trusts

When is a trust a relevant person?

Legal consequences of a failure to identify

Exchange of information clauses

11.20 | **Derek Scott**, Director of Tax Investigations, KPMG UK

Justine Markovitz, Partner and Head of Swiss Operations, Withers LLP, Geneva

What are the options for UK tax payers after Rubik? Self declaration ? LDF?

Liechtenstein Disclosure Facility: recent developments; key practical aspects to date

Swiss Agreement- withholding or disclosure?

Life after the LDF- what are UK clients looking for?

HMRC scrutiny of HNWI's in 2012 and beyond

12.30 |

Lunch

14.00 | **James Badcock**, Partner, Collyer Bristow LLP, Geneva

Blanca Bulovic, Attorney-at-Law, Solutions Avocats, Geneva

ISSUES AND SOLUTIONS FOR THE UNDECLARED UK CLIENTS

Cross border issues to access the UK onshore market

General framework and conditions

Rubik facilitated access to the UK market: what does it mean in practice?

Risks of Swiss bankers not respecting the UK rules : sanctions in UK, sanctions in Switzerland

Cross border guidelines for the UK

Wednesday 14 November 2012

Geneva, Grand Hotel Kempinski

14.40 | **Andrew McKenna**, Partner, Smith & Williamson, Manchester

15.20 |

15.40 | **Simon Denton**, Managing Director, Sovereign (UK), London

16.20 | **Andrew Riant**, Regional Sales Director UK, Swiss Life Holding AG, Zürich
Herbert Pucher, Head Portfolio Management, Swiss Life Holding AG, Zürich

17.00

ANTICIPATING THE UK TAX REFORMS

UK reforms and future projects of the HMRC

Rules on residents non doms
 Tax evasion

Coffee break

COMPLIANT SOLUTIONS FOR THE DECLARED UK CLIENTS

Compliant tax planning solutions for UK tax payers (including IHT planning and how to navigate through the HMRC Disguised Remuneration Rules) and UK property investment (the new regime relevant to UK residents and overseas investors)

The purchase of UK real estate by non natural persons (relevant to both UK and non UK tax payers)
 Qualifying Non-UK Pensions Schemes (QNUPS), the deferral of income, capital gains taxation and UK inheritance tax planning
 Qualifying Recognised Overseas Pension Schemes (QROPS), offshore and EU pension trustee arrangements

Structures for image rights and intellectual property planning, especially with regard to attracting royalty income from the UK and other onshore nations
 Self Employment Benefit Trusts (SEBTs), a viable replacement to EBT's and EFRBS, relevant to both UK tax payers and UK companies
 Insurance related tax planning

How can Private Placement Life Insurance help UK clients for tax planning purposes?

UK Clients: What they face today & tomorrow
 Introduction to Wealth Planning through Life Insurance: A Peace-of-mind Compliant Solution
 The Life Asset Portfolio (LAP) UK:
 It's features

When to use it
 Client benefits
 Business Partner benefits
 Case Studies

End of the conference

How to register:

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By fax: +41 (0) 22 849 01 10
By e-mail: info@academyfinance.ch
By post: Academy & Finance SA,
 PO Box 6069, CH-1211 Geneva 6

Conference fee

1350 CHF, VAT not included (+ 8%)
 Discounts: 2nd delegate -10%, 3rd delegate -15%

Registration and payment

To confirm your booking, credit card details must be given as a guarantee of payment. Payment by cheque or bank transfer must be received by Academy & Finance BEFORE the conference date to guarantee admission

Transfer of registration

Registrations can be transferred within a firm or company

Cancellation dates

Cancellations received by 12 October 2012 will receive a full refund. Cancellations received between 13 October and 31 October will receive a 50% refund less the administrative fee. No refund after 31 October 2012.

Yes, I would like to register for the seminar «UK clients and fiscal transparency» in Geneva on 14 November 2012

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