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

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
UK CLIENTS AND FISCAL TRANSPARENCY

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

End of the conference

How to register:
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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.

UK CLIENTS AND FISCAL TRANSPARENCY

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 though 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

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

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The organisers reserve the right to change the programme if, despite their best efforts, circumstances oblige them to do so.