

CYPRUS FORWARD

The second annual conference on Cyprus
as an international wealth management centre

INVITED SPEAKERS

Liana Charalambous,
Chief Revenue Officer,
Inland Revenue Department, Nicosia

Brent Vanderbrook,
Founder, CRS View Ltd.;
Managing Director, Vanderbrook & Co, Zurich

Mark Morris,
Mark Morris Consulting, Zurich

George Savvides,
President,
Cyprus Fiduciary Association, Limassol

Neofytos Neofytou,
Managing Director, Redimus Services
Limited, Limassol

Elias Neocleous,
Advocate/ Vice Chairman,
Andreas Neocleous & Co LLC, Limassol

Alexey Katulevskiy,
Partner, Member of the Board,
Direct Capital Solutions Limited, Moscow

Oleg Konnov,
Partner, Herbert Smith Freehills, Moscow

Simon Denton,
Managing Director,
Sovereign (UK), London

- > **CYPRUS AND INTERNATIONAL STANDARDS OF AML & FISCAL TRANSPARENCY**
- > **FATCA & AUTOMATIC EXCHANGE OF INFORMATION**
- > **TAX COMPLIANCE**
- > **CYPRUS FORWARD**
- > **CYPRUS AND RUSSIAN CLIENTS**
- > **UK ASSETS: NEED FOR CHANGE**
- > **GREECE**
- > **WEALTH PLANNING INSTRUMENTS**

8.50 Introduction by the chairman of the conference

CYPRUS AND INTERNATIONAL STANDARDS OF AML & FISCAL TRANSPARENCY

9.00 **Cyprus and the international standards of OECD, FATF, EU**

- Implementation of the Automatic Exchange of Information: the EU DAC: the Cyprus law.
- Implementation of FATCA: the Cyprus law.
- Implementation of the FATF recommendations / Implementation of the 4th EU AML directive: consequences on customer due diligence, identification of the ultimate beneficial owner, PEPs and structures of PEPs, register of beneficial owners...

Invited: Liana Charalambous, Chief Revenue Officer, Inland Revenue Department, Nicosia

9.40 **Cyprus and international fiscal cooperation: state of the practice**

- Exchange of information on request
- Grouped demand of information

Invited: Cyprus Tax Administration

10.20 Coffee break

FATCA AND AUTOMATIC EXCHANGE OF INFORMATION

10.40 **FATCA reporting for trusts and fiduciary companies**

Invited: Brent Vanderbrook, Founder, CRS View Ltd.; Managing Director, Vanderbrook & Co, Zurich

11.20 **Automatic Exchange of Information: Trusts, underlying companies, life insurance: who must report?**

- Differences between FATCA and Automatic Exchange of Information (DAC/ CRS)

Invited: Mark Morris, Mark Morris Consulting, Zurich

12.00 **Getting ready for CRS: Due diligence procedures**

- What is the purpose of the due diligence procedures?
- When does the work start?
- Main distinctions: pre-existing / new accounts; individual/entity accounts.
- Problems of classification of the entities: FI / NFE/ Passive NFE
- Models of self-certification for CRS: what is required in Singapore; what does the OECD standard say
- Logic of self-certification followed by bank control
- Problems with self-certification: need for reasonableness test
- Main differences with FATCA
- Due diligence for pre-existing individual accounts
 - . for Low Value Accounts
 - . for High Value Accounts (HVA)
- Due diligence for new individual accounts
- Due diligence for entity accounts:
 - . Due diligence for pre-existing entity accounts
 - . Due diligence for new entity accounts

Invited: Deloitte/ PwC/ EY/ KPMG

13.00 Lunch

TAX COMPLIANCE

14.30 **Cyprus policy relative to acceptance of undeclared/untaxed funds**

- tax evasion as predicate offence to money laundering
- acceptance of new clients, opening new accounts with undeclared money
- obligations to assess the tax situation of the client
- keeping existing clients with undeclared money: what risk for the bank when Automatic Exchange of Information will reveal that the bank is managing undeclared money?
- AML duties of corporate agents, corporate service providers, to control of the funds are declared or not
- reporting the authorities
- closing accounts; transfer of funds to other banks
- liability in Cyprus and abroad of financial intermediaries, tax advisers, etc... for foreign serious tax crimes; new trend: fiscal solidarity of the advisers: the adviser is condemned to pay the evaded taxes that the client should have paid (cases in France: Ricci)

Invited: Cyprus Financial Regulator / Central Bank / Minister of Finance

15.30 Coffee break

15.50 **What will be the impact of the revised EU Parent Subsidiary Directive on the way Cyprus companies are managed? How to increase economic substance?**

- The revised EU Parent Subsidiary Directive adds a binding General Anti-Abuse Rule (GAAR) to prevent tax avoidance and aggressive tax planning by corporate groups: which schemes will hold after the transposition of the directive in Cyprus law?
- How to reconsider the way Cyprus companies are managed?
- How to increase economic substance for: holding companies, financing companies, IP/royalties companies, trading companies...

**Invited: George Savvides, President, Cyprus Fiduciary Association, Limassol
Neofytos Neofytou, Managing Director, Redimus Services Limited, Limassol**

16.40 **How will OECD BEPS plan will be implemented in Cyprus? What will be the impact on the solutions offered to the clients? What will be the effect on the corporate service industry in Cyprus?**

**Invited: George Savvides, President, Cyprus Fiduciary Association, Limassol
Neofytos Neofytou, Managing Director, Redimus Services Limited, Limassol**

17.30 Coffee break

19.30 Cocktail and Gala Dinner

8.50 Introduction by the chairman of the conference

CYPRUS FORWARD

9.00 **Current and upcoming reforms to position Cyprus as a jurisdiction of choice for international tax planning**

- introduction of a «non-domiciled» regime
- introduction a foundation law

Invited: Elias Neocleous, Advocate/ Vice Chairman, Andreas Neocleous & Co LLC, Limassol

9.30 **Cyprus as a key jurisdiction for outbound investments from Russia and to Eastern/Central Europe**

Invited:

CYPRUS AND RUSSIAN CLIENTS

10.00 **Compliant and robust asset protection in new international realities**

- Brave New World – “Transparency UNlimited”
- Common family and business structures for Russian clients - challenges, risks, practical hints
- Asset protection vs. compliance and transparency - finding the right mix
- Creating optimal structures: reducing costs and complexities
- Choice of jurisdictions and substance: more important than ever
- The latest on Private Trust Company, Private Family Foundation, Private Label Fund
- Cayman solution and other case studies

Invited: Alexey Katulevskiy, Partner, Member of the Board, Direct Capital Solutions Limited, Moscow

10.40 Coffee break

11.00 **CFC rules: what are the trends? How are tax authorities enforcing CFC rules?**

- Outline of the rules
- Interaction with the Cyprus-Russia DTA
- Steps taken by Russian businesses
- Are Russian clients moving abroad or abandoning offshore structures?
- What are the main legal and practical problems with the Russian CFC rules?
- CFC reform and the recognition and taxation of trusts & foundations with a «Russian» element
- What are the expected changes to the legislation?

Invited: Oleg Konnov, Partner, Herbert Smith Freehills, Moscow

Elias Neocleous, Advocate/ Vice Chairman, Andreas Neocleous & Co LLC, Limassol

11.30 **Russian tax administration and the issue of lack of substance of companies: what are the usual weaknesses and how to strengthen your companies?**

Russian rules and practice

- What instruments Russian authorities have to combat limited substance (GAAR, beneficial ownership, permanent establishment, etc.)?
- How Russian rules and practice correspond with BEPS and practice in other countries?
- Has it become more difficult to get tax residency certificates?
- What are the minimum standards and good practice in substance?

Cyprus rules and practice

- Provisions of the Cyprus-Russia DTA regarding residence
- Cyprus – management and control test
- Management and control in practice

- The main pitfalls
- Practical recommendations

Invited: Oleg Konnov, Partner, Herbert Smith Freehills, Moscow

Elias Neocleous, Advocate/ Vice Chairman, Andreas Neocleous & Co LLC, Limassol

12.00 **Challenges of new Russian tax residency rules for companies**

- Legal consequences of tax residence
- What structures are at risk?
- Compulsory and optional tax residence
- The main and auxiliary tests for compulsory tax residence
- Place of effective management definition
- Shift of tax residence to Russia by choice
- PE or tax residence
- Coordination with foreign authorities

Invited: Oleg Konnov, Partner, Herbert Smith Freehills, Moscow

12.30 Lunch

UK ASSETS: NEED FOR CHANGE

14.00 **Reform of the UK Res Non Dom regime, reform of UK property taxes...: which implications for the choice of compliant onshore and offshore structures to hold UK assets?**

- How, why and when to use UK, overseas companies and other international arrangements including Trusts as well as PTC's to acquire and invest in UK property
- What has been the impact to the London property industry since the overhaul of the non-dom legislation and the changes to SDLT, CGT and IHT
- Applicable Finance Act 2015 compliant structures relevant to buying a main and secondary residence by non-UK domiciled persons

- To explore the new and best arrangements to use relevant to the purchase of a buy-to-let real estate portfolio and why offshore structures should still be considered
- The use of offshore entities for the purpose of investing in UK commercial property

- What arrangements and planning can still be deployed for UK property development and trading

Invited: Simon Denton, Managing Director, Sovereign (UK), London

GREECE

14.40 **Greece tax reforms: what consequences for Greek clients residents / non residents and other clients holding property and assets in Greece?**

Invited:

15.20 Coffee break

WEALTH PLANNING INSTRUMENTS

15.40 **The use of family foundations: Netherlands, future Luxembourg foundation, future Cyprus foundation (law in pipeline)**

Invited:

16.20 **Life insurance**

Invited: Swisslife

17.00 End of the conference