

INNOVATIVE TAX PLANNING STRUCTURES FOR LATIN AMERICA

Rethinking compliant solutions for corporate investments and estate planning in Brazil, Mexico, Argentina and Uruguay



- Global investment projects in Latin America: How to choose the efficient vehicles in onshore jurisdictions?
- Corporate investment structuring with Brazil
- Investments in Mexico and Argentina : Tax Analysis and Business Case
- Estate planning for Latin American clients: how to use trusts, life insurance and alternative structures?

SPEAKERS

Olivier Leclipteur,
TEP, Member of the Executive Board, Experta,
Corporate and Trust Services, Luxembourg

Giancarlo Chamma Matarazzo,
Partner, Pinheiro Neto, Advogados, Sao Paulo

Diogo Duarte de Oliveira,
A. Manager, International Corporate Tax, KPMG Tax,
Luxembourg, seconded in Mexico City with KPMG
Cárdenas Dosal, S.C.

Ignacio Mañe Pinilla,
Partner, M&O Abogados, Barcelona

Josep M. Ortado Domenech,
Partner, M&O Abogados, Barcelona

Yannick Kantor,
Area Manager, Spain and Latin America, Experta
Corporate and Trust Services, Luxembourg

Simon Denton,
Director of The Sovereign Group, London,

Tuesday 9 March 2010, Geneva, Four Seasons Hotel des Bergues

OBJECTIVES OF THE CONFERENCE

History shows that a financial crisis leads to new regulation. A consequence is that so called “tax haven” international private banking centers, have increasingly come under the spotlight. Globalization is leading to significant changes which would lower the hold of tax havens and increase international exchange of tax information and the development of international treaties. Surely, we are moving towards an era of compliant confidentiality. We have to plan for a tax-transparent world in order to be compliant with the new regulations : being innovative enough to match the requests of the new wealth management and corporate engineering landscape. Latin American Business is prepared to meet the challenges of the new global market and presents for international investors real opportunities in different fields : real estate, raw material, industrial companies... Consequently, considering this new era, we have to redefine ways to deliver compliant solutions for corporate investments and estate planning in Latin America.

THE SPEAKERS



Olivier Leclipteur is graduated from HEC Business School Belgium as commercial engineer and he is a CEFA Financial Analyst. He began his career in the field of business development for private banking clients located in Africa for a French bank. Then, after being in charge of The Relationship Management for Dexia S.I.M. in Milano, he became Head of Private Banking Center for Italy and Spain in Luxembourg. In 2007, Olivier joined Experta Corporate and Trust Services in Luxembourg as Member of the Executive Board to be in charge of the Customer Relationship Management and Corporate Services. He is now completing a MBA at Manchester Business School.



Yannick Kantor is graduated from the law school of Université de Liège (Belgium) and achieved a post-graduate degree from Universidad de Oriente in Santiago (Cuba) specialized in the international law. Yannick started his career in the trust services business as Legal and Tax Advisor in corporate and investment structures then became Legal Counsel at Société Générale Bank & Trust in Luxembourg. He joined Experta Corporate and Trust Services in Luxembourg in 2004 as Area Manager working in the field of Wealth Management for Ultra High Net Worth Individuals from Spain and Latin America. He has a sound knowledge of Estate Planning and structuring investments on the covered areas.



Giancarlo Chamma Matarazzo's areas of practice include: domestic and international tax law; individual and corporate income tax; non-resident taxation; federal taxes; taxation of M&A transactions; taxation of financial and securities transactions; accounting; tax planning; estate planning; administrative and judicial proceedings; international treaties to avoid double taxation of income. He has a LL.B. degree from the São Paulo University (1998), a specialization degree in Tax Law from the São Paulo Catholic University (2000), an MBA in Finance from the Brazilian Institute of Capital Markets - IBMEC (2004), and a LL.M. in Tax Law from the Leiden University, Netherlands (2005). He was foreign associate at Deloitte Touche Tohmatsu (Rotterdam) in 2005 and Assistant Professor at the Leiden University.



Simon Denton began his offshore career in 1988 with The Consult Group in the Principality of Andorra before joining the Gibraltar offices of The Sovereign Group in 1990. Whilst in Gibraltar, he became the managing director of the Group's HQ, served two terms as Chairman of the Association of Trust & Company Managers and was a member of the Gibraltar Government Financial Services Legislation Committee. He moved to London in 1996 to establish and be the managing director of the Group's UK subsidiaries. In 2006 he became a director of The Sovereign Group. Since returning to the UK, Simon has been the Chairman of the Offshore Institute's UK Chapter, is the Deputy-Chairman of the Royal Society of Fellows and is a regular speaker at tax planning conventions throughout the world.



Diogo Duarte de Oliveira works on M&A and Private Equity with KPMG Tax, Luxembourg. He has particular expertise in the Iberoamerican region and is heavily involved in cross-border holding, financing, IP licensing and supply chain structures, and group reorganizations. He is currently seconded in Mexico City. Diogo also practiced as a lawyer with a Portuguese leading law firm and as a tax adviser for a Big4 firm in the Netherlands. Diogo holds an International Taxation LL.M. from Leiden University, Netherlands. He was awarded his law degree from the Portuguese Catholic University and his post-graduate diploma in tax law from ISG – Business School, Portugal. Diogo is member of the Portuguese Bar Association and of the IFA.



Ignacio Mañe Pinilla is Partner at M&O ABOGADOS, a boutique law firm in Barcelona specialized in International Tax and International Corporate Law. He serves multinationals and Private Equity houses in their international operations such as acquisitions, divestments, restructurings. Prior to that he worked for Morgan Stanley as Tax Lawyer of M&A transaction and Fund Structurings. He holds a Law Degree and a Master Degree in International Taxation from the University of Barcelona and a Global Executive MBA from IESE. He teaches the International Tax Course at the Master of Accounting and Taxation of the University of Barcelona and is a frequent speaker in courses and seminars relating to International Taxation. He is a member of the International Fiscal Association and a member of the Spanish Association of Financial Law.

8.45 | **Olivier Leclipteur**, TEP, Member of the Executive Board, Experta, Corporate and Trust Services, Luxembourg

9.00 | **Giancarlo Chamma Matarazzo**, Partner, Pinheiro Neto, Advogados, Sao Paulo

9.45 | **Olivier Leclipteur**, TEP, Member of the Executive Board, Experta, Corporate and Trust Services, Luxembourg

10.50 |

11.15 | **Diogo Duarte de Oliveira**, A. Manager International Corporate Tax, KPMG Tax, Luxembourg, seconded in Mexico City with KPMG Cárdenas Dosal, S.C.

12.45 |

14.15 | **Ignacio Mañe Pinilla**, Partner, M&O Abogados, Barcelona

Josep M. Ortado Domenech, Partner, M&O Abogados, Barcelona

Yannick Kantor, Area Manager, Spain and Latin America, Experta Corporate and Trust Services, Luxembourg

15.45 |

16.15 | **Simon Denton**, Director of The Sovereign Group, London, UK

17.30 |

Opening speech by the Chairman of the Conference

Corporate Engineering in Latin America: the emerging trends

Economic and political environment: areas of expected growth and opportunities for investments
Recent developments in the financial and capital markets in Brazil: new rules for the capital market and economic developments to come
Tax environment for foreign investments: finan-

cial markets, private equity investments, adoption of IFRS in Brazil, new thin capitalization rules and tax reform
Brazilian tax holidays and opportunities: tax incentives, utilization of the goodwill for tax purposes, special regime for exporting companies

Global investment projects in Latin America: How to choose the efficient vehicles in the onshore jurisdictions?

How to choose a jurisdiction for Latin American investments
Why Luxembourg is jurisdiction of choice
Comparative analysis of the useful SPV's to invest in Latin America:

- . Spanish SPV's
- . Luxembourg SPV's
- . Dutch SPV's

Hybrid instruments: how do they work?

Coffee break

Corporate investment structuring with Brazil

Luxembourg holding and financing companies
Brazil anti-tax haven legislation
Double Tax Treaty Luxembourg / Brazil (and other relevant DTTs)
. Dividends
. Interest

- . Capital gains
- . Luxembourg / Brazil inbound structures
- . Luxembourg / Brazil outbound structures

Lunch

Investments in Mexico and Argentina: Tax Analysis and Business Case

Mexico

- Corporate Tax in Mexico
- Double Tax treaties
- Acquiring a business in Mexico in an efficient way
- Latest tax development in Mexico

Argentina

- Corporate Tax in Argentina
- Double Tax treaties
- The Argentina anti-tax haven legislation: IGJ
- Investing in an Argentinian company

Uruguay

- Corporate Tax in Uruguay
- Double Tax treaties
- The use Uruguay holding company for investments in Latin America
- The special tax regime in Free Trade Zone of Uruguay

Business Case

- Investment project in Latin America

Coffee break

Estate Planning and Compliant Solutions for Latin American Clients

How to deploy special purpose trusts for Latin American clients
Utilising insurance related tax planning for Latin American clients

Alternative structures with practical illustrations featuring charities, hybrids and SPV's

End of the conference

9 March 2010, Geneva, Four Seasons Hotel des Bergues

VENUE DETAILS

Four Seasons Hotel des Bergues
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Conference fee 1250 CHF / 830 euros
VAT not included (+ 7,6%)
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 10 February 2010 will receive a full refund. Cancellations received between 10 February 2010 and 25 February 2010 will receive a 50% refund less the administrative fee. No refund after 25 February 2010 .

REGISTRATION FORM

[] YES, I would like to register for the conference "Innovative tax planning structures for Latin America" on the 9th March 2010 in Geneva

Full name

Position

Company

Address

.....

Postcode City Country

Tel Fax

Mobile E-mail

[] I do not wish to appear on the list of attendees

Special dietary requirements (if any)

I wish to pay by: Credit card [] Bank Transfer [] Cheque []

Credit card payments will be debited immediately upon receipt of card details. Credit card payments will be subject to a surcharge of 4 % (inc. VAT) to cover commission charge.

Mastercard [] VISA [] AMEX [] Business card [] Personal card []

Card No: _____ / _____ / _____ / _____ Expiry Date: ____ / ____

Name of card holder

Address of AMEX card holder

.....

Date Signature

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