

Spanish clients planning and investing in Spain: which compliant solutions?

- Tax planning schemes, real estate, bankable assets: what is the practice of the Spanish tax authorities?
- Which tax planning structures are vulnerable and should be reorganized?
- Which alternative compliant tax planning structures should be considered?

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Borja is a Partner in the Spain / Latin American Tax Group in the Zurich offices of Anaford Attorneys-at-Law. His practice focuses on wealth management and tax planning for corporate entities and private individuals whose assets span the globe.

Fabricio heads the Spanish tax practice in the Zurich office. His practice focuses on advising domestic and international Private Clients with regard to succession and wealth-planning strategies for inbound and outbound investments. Fabricio regularly advises international private banking and financial entities in relation to general tax planning strategies for Private Clients with links in both Spain and Latin American countries.

Jennifer is a Partner of Anaford, a law firm she co-founded in 2010, and co-heads the Spanish practice group. She specializes in international taxation for wealth-owning families, family offices and corporations. Her practice focuses on wealth restructuring transactions for both individual and corporations with connections to Spain.

9.00 How do Spanish tax authorities interpret and implement the anti-avoidance rules?

- Aggressive tax planning schemes: what are the schemes in the spotlight of the Spanish tax administration?
 - BEPS/ATAD
 - Lack of substance on international structures
 - CFC rules
 - Transfer pricing
- Latest criteria from the Spanish tax authorities and Courts of Justice

9.45 Planning on Real Estate

- Cross-border real estate investments in Spain
- Special tax regimes: SOCIMIs, real estate investment funds, Leased Real Estate Entities
- Latest criteria from the Spanish tax authorities and Courts of Justice

10.30 Coffee break

11.00 Planning on bankable assets

- Asset protection and tax efficiency
- Unit Linked, "Traspasos", SICAVs, SIFs, etc.
- Latest criteria from the Spanish tax authorities and Courts of Justice

11.45 Moving in and out of Spain

- Pre-emigration planning
- Cross-border succession: the use of trusts, private foundations and other succession planning schemes
- Special tax regime for expatriates ("Beckham Law")
- Exit tax
- Latest criteria from the Spanish tax authorities and Courts of Justice

12.30 End of the seminar

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PRACTICAL INFORMATION

Venue

Hotel Le Richemond
Rue Adhémar-Fabri 8-10, Geneva

How to register

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- 24 March 2018 refund of 80%
- 10 April refund of 30%
- after 10 April no refund will be made for cancellation.

REGISTRATION FORM

I register for the seminar «Spanish clients planning and investing in Spain» in Geneva on tuesday 24 April 2018.

FIRST PARTICIPANT

Full name.....
Position.....
E-mail.....

SECOND PARTICIPANT (-50%)

Full name.....
Position.....
E-mail.....
Company.....
Address.....
Postcode..... City.....
Tel Fax.....

Mastercard VISA AMEX

Credit card No : _____/_____/_____/_____ Expiry date : ____/____

Cardholder.....

Address of AMEX cardholder

Date Signature.....

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