Ukraine tax reform 2021: which strategies for your Ukrainian clients in 2020?

The massive Ukrainian tax reform 2021 was approved on 16 January 2020: what are the upcoming changes relative to CFC rules and substance rules? A tax amnesty will be offered in 2020. How to design efficient tax and estate planning structures for your Ukrainian clients?

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Angles is a wealth architect. We work directly with entrepreneurs, business owners and their families to provide tax and legal help, manage personal and business risks, resolve complex problems, find unconventional solutions, and consider your concerns from different angles: International tax planning, Succession planning, Asset protection, Family governance, M&A and deals. We are based in Zurich but work internationally - there are almost no geographical limits to what we can do. Our focus markets are Russia, Ukraine, Kazakhstan and Switzerland.

UKRAINE’S ANTI-OFFSHORE OVERVIEW BY INSIDERS

• Behind the scenes of the legislative drafting process
• Inside the Parliament’s brain: intentions of lawmakers
• Impact of 2021 massive domestic tax reform

TAXPAYER’S PAIN: YOUR NEW OBLIGATIONS

CFC rules - to disclose & tax what was untouchable before
• Definition of control
• Exempt CFCs
• Timeline & transition period
• Notifications & reporting
• Taxation & penalties

Substance rules - to bring down to earth what survived after CFC rules
• Place of effective management defined
• Expanded permanent establishment criteria
• Taxation of foreign companies in Ukraine
• New powers of tax authorities to tame foreign companies

Source taxation - to tax what was created in Ukraine
• Tax on indirect disposal of Ukrainian immovable property
• Immovable property defined
• Upgraded definition of income from Ukrainian sources
• Cyprus tax treaty complications

Automatic information exchange - to make all above function
• Current status & plans
• Forecast of the first exchange with Switzerland

TAXPAYER’S RELIEF: YOUR NEW OPPORTUNITIES

Tax amnesty - to bridge into a new tax environment
• Current status & plans
• Eligible taxpayers, income & assets
• Tax rates
• Guarantees of liability relief
• Timing concerns
• Disclosure requirements

Tax efficient liquidations - to leave the dark side in an elegant way
• Conditions to participate
• Tax rates
• Practical considerations

Look-through structures - to fight fire with fire
• Look-through approach defined
• Qualifying types of income
• Practical considerations

YOUR URGENT ACTION PLAN FOR 2020

Plan your solutions now - to avoid year-end queues
• Possible winning strategies
• Health check techniques
• Examples of bad advice to avoid at all cost

Consider relocation - to explore something new
• Key European destinations compared
• Common pre- or post- relocation mistakes

Check out key transformation strategies - to start saving on your structure
• Personal accounts
• Structures for protection & succession
• Look-through CFC
• Foreign structures with substance

OLD BUT NOT FORGOTTEN TOPICS

Currency control - to safely park your liquid assets
• Freedoms & restrictions under the new rules
• Tips & tricks based on one year of practical experience
• Government plans

Succession and family laws - to let your family enjoy what you earned
• Summary of Ukrainian domestic laws & opportunities
• Foreign instruments: functionality & costs compared

CASE STUDIES AND Q&A

• Interactive session with practical real-life examples
Ukrainian tax reform 2021: which strategies for your Ukrainian clients in 2020?

PRACTICAL INFORMATION

Venue
Zunfthaus zur Waag
Münsterhof 8, Zürich

How to register
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• 12 February refund of 30%
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Cardholder..............................................................................................................................
Address of AMEX cardholder ..............................................................................................
Date ..................................... Signature...............................................................................

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