

Challenges, new opportunities and solutions for Russian private clients

Compliant transfer of residence - **Controlled Foreign Companies** - **Russia-UAE Tax Treaty**
- **Shrinking network of Russian DTTs** - **Common mistakes in foreign currency operations**

Sergei Alimirzoev,
Partner,
ATL Consulting Sàrl, Geneva

Ilya Aleshchev,
TEP, Partner,
A&T Lawyers, Moscow

TRANSFER OF RESIDENCE

Mobility vs Local requirements: How to Stay Compliant, Connected, and in Control

- How dual nationality or residence affects disclosure duties, tax reporting, and access to assets.
- Cross-border compliance pitfalls: typical mistakes when Clients and their families have connections to multiple jurisdictions.
- Maintaining banking relationships while relocating: what banks expect from clients after a change of residence.
- How Russian Clients Rebuild their compliance narratives: how to explain past or present connections with Russia in a transparent yet defensible way
- Inheritance and family scenarios: what happens if heirs hold residence permits or second citizenships (Switzerland, EU, UAE, etc.).
- How to correctly "cut ties" with Russia: deregistration from military service and permanent residence.
- Deregistration from military service and permanent residence: pros and cons.
- Real client cases: lessons from 2025 on managing dual residency.

TAX PLANNING

Controlled Foreign Companies Under Pressure: Taxes, Risks, and Strategic Solutions

- CFCs in "unfriendly" jurisdictions: the new challenges and practical ways forward.
- Providers and banks refusing service to Russian-related CFCs: case studies and solutions.
- How to determine CFC profits and keep UBO tax compliant when the company's auditors and directors refuse to cooperate and provide no data.
- "Blacklists" reshaping ownership structures and compliance obligations.
- Fast-track re-domiciliation to Russia: when speed becomes a liability.
- The "look-through" approach to dividends: how it works in practice.
- Why the UAE remains attractive, but not a silver bullet.

The Russia-UAE Double Tax Treaty: A New Era for Investors

- When it takes effect and who will be most affected.

- Rationale for the new UAE-Russia Double Tax Treaty.
- Key provisions: what truly changes for individuals and companies.
- Unconventional Dividend Definition: Shifting the Tax Landscape for Businesses and Individuals.
- Taxation of remote employees in the UAE: what to expect.
- Strategic outlook: what this means for private banking and wealth planning.

Cross-Border Taxation 2025: A Changing Map for Global Wealth

- Residency vs. territoriality: where does the Russian tax law draw the line?
- Updated Russian withholding tax rates
- New Russian DTTs and the shrinking network of existing DTTs.
- Denunciation, suspension, and MLI: navigating the new treaty landscape.
- Practical steps to mitigate the impact of suspended agreements.

CURRENCY CONTROL

Currency Control Under the Microscope: Staying Safe in a Shifting Environment

- Common mistakes in foreign currency operations.
- Repatriation 2025: reform or rumor? What regulators really say.
- Rules for using accounts in jurisdictions that do not participate in automatic information exchange with Russia (such as Switzerland).

ASSET PROTECTION

Protecting Russian Assets Amid Nationalization Risks

- What instruments are used by the state to take control of assets?
- Landmark Cases: A look at the most high-profile examples of asset nationalization: what triggered them and how owners responded.
- Protective Structures and Solutions: Advantages of Russian private foundations for foreign investors under the new regulatory reality.

Challenges, new opportunities and solutions for Russian private clients

PRACTICAL INFORMATION

Venue
Hotel President
47 quai Wilson, Geneva

Visio conference on Zoom

The Zoom link and the documentation will be sent to the participants on 25 November in the afternoon. Academy & Finance provides technical assistance during the conference.

How to register

by phone: +41 (0) 22 849 01 11
by e-mail: info@academyfinance.ch
by post: Academy & Finance SA
3 rue Neuve-du-Molard, CH-1204 Geneva
www.academyfinance.ch

Fees

620 CHF (+ VAT 8.1%)
Additional registrations from the same company: - 50%

Registration and payment

Payment is made by bank transfer or by credit card. Credit card payments will be debited immediately upon receipt of card details. In any case, we will send you an invoice by email.

Substitution & cancellation policy

Substitutions from the same company are accepted at any time. Cancellation requests must be received in writing, by fax or by post up to the following dates end of business :

- 19 November refund of 90%
- after 19 November no refund will be made for cancellation.

REGISTRATION FORM

I register for the seminar "Challenges, new opportunities and solutions for Russian private clients" in Geneva on 26 November 2025.

☐ I will attend in the conference room ☐ I will attend online on Zoom

FIRST PARTICIPANT

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

SECOND PARTICIPANT (-50%)

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

Company.....
Address.....
Postcode..... City.....
Tel Mobile.....

Person to which the invoice must be sent for payment:

Name..... Email.....
Bank transfer ☐ Mastercard ☐ VISA ☐
Credit card No : ____/____/____/____ Expiry date : ____/____
Cardholder.....
Date Signature.....