New challenges for Russian clients

Where to next? What future for UAE as residence (US-Iran war)?

2027 tax reform - Russian administration controls the (non)residency

Sergei Alimirzoev,
Partner,
ATL Consulting Sàrl, Geneva

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

TAX REFORM 2027

Russia 2027: tax reform and the new rules for crypto and digital assets

Tax reform (Bill No. 617-9)

- Single progressive PIT scale 13–22%: investment income, dividends, CFC profits, crypto and digital financial assets in one tax base
- CFC rules: 50% control threshold, «sole control» test for trusts and foundations, abolition of the RUB 10m exemption, higher penalties
- Russian Personal Fund at 22% and ZPIF taxation: do they still make sense?

Crypto and digital assets (Federal Law 282-FZ, in force since 1 September 2026)

- Crypto recognised as property alongside other assets: what this means for inheritance, divorce and asset recovery
- Qualified vs retail investors, approved assets and the RUB 300,000 annual cap
- From 1 July 2027 Russian residents may transact only through registered intermediaries. What happens to holdings on foreign exchanges and private wallets?
- Crypto in cross-border trade settlements: a legal channel, with state-imposed special regimes possible
- Digital Roubles introduced by Russian legislation: is it a fiat or a crypro currency?
- A7 crypto facilitator under sanctions
- New ban on movement of over 1 mil RUB cross border

TRANSFER OF RESIDENCE

Where to next? New destinations for Russian clients

- Earlier popular jurisdictions lose appeal: higher taxes, sanctions, stricter compliance and political turbulence: UAE is still popular and remains in demand
- Baltic states close their door: what clients with expiring residence permits are doing now
- Lump-sum regimes for the wealthy: Italy at €300,000, Swiss forfait, UAE at zero. Who still qualifies?
- Argentina's new citizenship by investment (USD 350k / 800k): opportunity or legal minefield?
- Burning the bridges: will clients be able to return once the turbulence resolves?

Living between two worlds: proving [non]resident status

- Russian regulators require no links with the West, Western banks demand the opposite: what do clients do?
- Counting days: personal tax, CFC tax and currency control consequences
- Russian HNWI tax control unit and the usual tricks it already knows
- Maintaining «living outside Russia» status: immigration status, permanent home, substance, actual presence
- Keeping banking relationships, and what to do when the bank ousts the client
- What ties to Russia Client will need to sever, and what could still be tolerated?

RESTRUCTURING

Restructuring how Russian clients' assets are held: case studies

- Redomiciliation of an EU company to a «friendly» jurisdiction or to a Russian SAR
- Conversion of a company to a UAE foundation
- Parallel structures for Western and Russian assets
- Russian Private Foundation vs other asset protection options after the 2027 reform
- What your Russian-related client has probably forgotten about

FUTURE CHALLENGES AND OPPORTUNITIES

A glance into the future challenges and opportunities

- Exposure risks for cross-border Clients: tax, compliance, sanctions, asset freezes or seizures
- Tax check list until end of 2026: how to benefit from current tax rates in the light of 2027 tax increase
- Maintaining banking relationships (and what to do when the bank ousts the Client)
- Tax planning: is there such a thing in 2027? Russian UAE DTT and Russian tax reform, financial information exchange and tax audits as factors affecting Clients' behavior
- Multiple countries, multiple generations: how living between several jurisdictions complicates matrimonial, child and inheritance disputes, and what are typical pitfalls
- Practical considerations for travelers: connectivity, state surveillance, conscription
- What you need to remind your Russian-related Client (s)he has probably forgotten about?

ZURICH, WEDNESDAY 25 NOVEMBER 2026, 14.00-17.30, ZURICH SHERATON HOTEL / ONLINE

INFORMATION & REGISTRATION
Tel: +41 22 849 01 11
info@academyfinance.ch
Academy & Finance SA
Rue Neuve-du-Molard 3,
CH-1204 Genève
www.academyfinance.ch

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I register to the seminar "New challenges for Russian clients" in Zurich on 25 November.

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