



Wealth planning in a compliant world

- > Understand the new compliant world
- > Learn how to design compliant strategies for your private clients

Zurich, The Dolder Grand, 11-12-13 May 2011
STEP Swiss European Annual Conference

WITH THE EXCEPTIONAL PARTICIPATION OF:

Timothy Lyons QC,

Tax Chambers,
15 Old Square, London

Dr. Urs Zulauf,

Deputy CEO, General Counsel, Head Strategic Services,
Swiss Financial Market Supervisory Authority FINMA

Thierry Boitelle, Tax partner, Altenburger, Geneva
Olga Boltenko, Partner, Withers, London
James Brockway, Partner, Withers, New York
David Brownbill QC, Barrister, XXIV Old Buildings, London
Johannes Burger, Partner, Marxer & Partners, Vaduz
John Conder, Partner, Macfarlanes LLP, London
Maria Isabel Tostes da Costa Bueno, Partner, Mattos Filho Veiga
Filho Marrey Jr. e Quiroga Advogados, Sao Paulo
Pierre-Jean Douvier, Partner, CMS Bureau Francis Lefebvre, Paris
Dr. Martin Feick, Partner, Schilling, Zutt & Anschütz, Mannheim

Charles Fox, Senior Associate, Laven Partners, London
Richard J. Hay, Principal, Stikeman Elliott, London
Julian Haydon, Director, Hawksford International, Jersey
Jérôme de Lavenère Lussan, Founder & CEO, Laven Partners, London
Guglielmo Maisto, Partner, Maisto e Associati, Milan, Professor of
Tax Law at the Catholic University of Piacenza
Peter Pexton, Chairman of STEP Vaduz Centre, Vaduz
Patrick Schmutz LL.M., Solicitor, Niederer Kraft & Frey AG, Zurich
Timothy Urquhart, LS&S GmbH, Zurich
David Wilson, Partner, Schellenberg Wittmer, Geneva

STEP members: 24 hours of CPD

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Wednesday 11 May 2011

13.30 |
 13.50 | **Peter Pexton**, Chairman of Verein STEP
Nicole Hausmann, Chairman of Zurich Centre

Registration

Welcome from the Verein STEP Switzerland Chairman
Welcome from the STEP Zurich Centre Chairman

PRE-CONFERENCE SEMINAR

14.00 | **Thierry Boitelle**, Tax partner, Altenburger, Geneva
Jérôme de Lavenère Lussan, Founder & CEO, Laven Partners, London
Charles Fox, Senior Associate, Laven Partners, London

Wealth planning and relocation solutions for hedge funds managers in Europe

Relocation of management companies
 Tax considerations
 Regulatory considerations
 Jurisdictional review (incl. Switzerland and Luxembourg)
 Practical considerations

Relocation of hedge funds
 Methods of relocation
 Legal procedure
 Jurisdictional review (incl. Ireland and Luxembourg)
 Implications for investors and service providers

17.30 | **End of the first day**

Thursday 12 May 2011

8.30 |
 8.50 | **Peter Pexton**, Chairman of Verein STEP
Nicole Hausmann, Chairman of Zurich Centre
Timothy Urquhart, Conference Chairman

Registration

Welcome from the Verein STEP Switzerland Chairman
Welcome from the STEP Zurich Centre Chairman

Introduction

9.00 | **Timothy Lyons QC**, Tax Chambers, 15, Old Square, London
Dr. Urs Zulauf, Deputy CEO, General Counsel, Head Strategic Services, Swiss Financial Market Supervisory Authority FINMA, Bern
Richard J. Hay, Principal, Stikeman Elliott, London

Understanding the new compliant world and reinventing wealth planning

Government pressures for a transparent world: what next?
 OECD peer review project on tax information exchange: progress report
 Will FATCA mean a loss of US interest in international programs for tax information exchange?
 Information exchange on request: will it go automatic?
 What happened to plans to amend the EU savings tax directive?

Swiss/UK negotiations on tax enforcement for bank accounts
 Should governments regulate corporate and trust service providers?
 Legal risks of offering cross-border services and products
 Risks deriving from prudential and tax regulation
 Expectations of FINMA with regard to supervised institutions

10.30 | **Coffee break**

STEP Swiss European Annual Conference

Thursday 12 May 2011

11.00 | **Guglielmo Maisto**, Partner, Maisto e Associati, Milan, Professor of Tax Law at the Catholic University of Piacenza
David Brownbill QC, Barrister, XXIV Old Buildings, London

How to structure the wealth planning vehicles of common law and civil law : trust, foundation, holding company, life insurance...?

Regulatory authorities recent approach towards foreign companies, trusts and wealth planning structures
Trusts: impact of governance on wealth planning
Holding Companies: Judicial Trends on residence and beneficial ownership
Insurance Policies: misuse of legal features and

planning ramifications
Exchange of information, EU Directives: impact on wealth planning structures
New and proposed anti-money laundering requirements and their impact on Trusts Foundations and Life Insurance Policies

12.30 |

Lunch sponsored by



14.00 | **Dr. Martin Feick**, Partner, Schilling, Zutt & Anschutz, Mannheim

Compliant wealth planning strategies for German clients

Recent developments in Germany:
The new German gift and inheritance tax regime - opportunities for wealthy clients.
The new exit tax rules.
Avoiding the exit tax: the revival of family foundations in Germany.

Legal challenges for German clients living abroad - don't forget German forced heirship rules in the tax planning.
Special opportunities for tax planning under the German/Swiss DTA for the avoidance of taxes with respect to taxes on estates and inheritances.

14.40 | **John Conder**, Partner, Macfarlanes LLP, London

Compliant wealth planning strategies for UK clients

Pre-arrival planning for non-UK domiciliaries
UK property ownership structures

Use of the LDF
Exit planning for UK domiciliaries

15.20 | **Pierre-Jean Douvier**, Partner, CMS Bureau Francis Lefebvre, Paris

Compliant wealth planning strategies for French clients

Tax optimization / tax planning with respect to wealth transfer technique and use of assets
Real property / Asset protection: management; means of ownership: use of vehicles/Split of ownership; tax regime upon purchase, use, transfer
Beneficial owners / Legal owners from a French viewpoint / tax impacts
Use of vehicles within a French context: Trust, Fiducie, Foundation, general partnerships
Life Insurance engineering

The bilateral context within France: DTA - TEIA / Exchange of information / practice; experience
The French measures on tax evasion and fraud: new rules - scope - implementation of those French rules (practical aspects)
The practical process of investigations from a French viewpoint (domestic - administrative assistance - European Law - Treaty Law)
Statute of limitation

16.00 |

Coffee break

16.20 | **Maria Isabel Tostes da Costa Bueno**, Partner, Mattos Filho Veiga Filho Marrey Jr. e Quiroga Advogados, Sao Paulo

Compliant wealth planning strategies for Latin American clients

Form and substance - tax authorities view on the economic purpose
Filling the blanks - how far can both taxpayers and

tax authorities go?
Braziliana Revenue Service - how far they may go?
After all, what is safe to do?

17.00 | **Olga Boltenko**, Partner, Withers, London

Estate planning and use of trusts for wealthy Russians

Current Russian wealth management issues and instruments used by Russian clients
International tax structuring for Russian wealthy families and successful entrepreneurs

Do you speak "trust"? Russian law and practice
My wealth management tools are working now, but what about tomorrow? Expected developments in Russian tax law

17.40 |

End of the second day of the conference

19.30 GALA DINNER AT THE HOTEL UTO KULM****, UETLIBERG SPONSORED BY





Friday 13 May 2011

8.30 |

Registration

8.55 | **Timothy Urquhart**, Conference Chairman

Welcome

POST-CONFERENCE SEMINAR

9.00 | **David Brownbill QC**, Barrister, XXIV Old Buildings, London

John Conder, Partner, Macfarlanes LLP, London
David Wilson, Partner, Schellenberg Wittmer, Geneva

How to use the Trusts in a compliant world

Baby-boomers' needs for estate planning
Asset protection in a distressed world
Business trusts
The family business - planning to avoid disputes

and managing the unavoidable
Viable cross-border opportunities
Trusts and confidentiality in the 21st century

10.30 |

Coffee break

11.00 | **Johannes Burger**, Partner, Marxer & Partners, Vaduz

Patrick Schmutz LL.M., Attorney-at-Law, Solicitor, Niederer Kraft & Frey AG, Zurich
James Brockway, Partner, Withers, New York
Julian Haydon, Director, Hawksford International, Jersey

How to use the Partnerships and Foundations in a compliant world

The use of Partnerships, Foundations and other Civil law structures for wealth planning
The use of these structures from the US and European points of view

Do they work from the point of view of compliance, flexibility, and protection of wealth?
What is the attitude of various tax authorities towards such structures?

12.30 |

Lunch sponsored by **microgen**

14.00 |

End of the conference



GALA DINNER AT THE HOTEL UTO KULM**, UETLIBERG**

The majestic view over the rooftops of Zurich does not disappoint on Uetliberg (871 metres above seal level). We are delighted to present the Gala Dinner at the UTO KULM Hotel and restaurant a place full of tradition. UTO KULM is a favourite restaurant for excursions from Zurich.

IMPORTANT NOTICE (particularly for ladies in our party): The UTO KULM is located at the top of the UETLIBERG one of the two Mountains dominating

Zurich. From the car park it is an easy walk (not more than 10 minutes) on a woodland track to the Restaurant. Please ensure that you bring suitable footwear.

The gala dinner is included in the two-day and three-day conferences packages. Accompanying persons to the gala dinner: + CHF 190. This price does not include the Swiss VAT (8%).

STEP Swiss European Annual Conference



PRACTICAL INFORMATION

VENUE

The Dolder Grand Hotel

Kurhausstrasse 65, Zurich
Tel. +41 44 456 60 00

HOW TO REGISTER

by phone: +41 (0) 22 849 01 11
by fax: +41 (0) 22 849 01 10
by e-mail: info@academyfinance.ch
by post: Academy & Finance SA,
PO Box 6069, CH-1211 Geneva 6
www.academyfinance.ch

FEES

If you are a member of STEP or of the BSCC, the following reduced fees apply:

- > for the whole event: CHF 2290
- > for 11 & 12 May only: CHF 1690
- > for 12 & 13 May only: CHF 1690

If you are NOT a member of STEP or of the BSCC, the following fees apply:

- > for the whole event: CHF 2590
- > for 11 & 12 May only: CHF 1890
- > for 12 & 13 May only: CHF 1890

The gala dinner is included in these prices. Accompanying persons to the gala dinner: + CHF 190.
Hotel rooms are not included.
These prices do not include the Swiss VAT (8%).

DISCOUNT

If there are two or more attendees from the same institution, a 10% reduction of the fees may be claimed for the second and the third registration.

ACCREDITATION

The Seminar is accredited for 24 hours of CPD (Continuing Professional Development) STEP, Law Society (England and Wales), Bar Council (England and Wales).

REGISTRATION AND PAYMENT

Upon reception of your registration, Academy & Finance will send you an invoice. Payment can be made by credit card, bank transfer or cheque. Your registration will be binding on the organisers only after payment has been received in full by Academy & Finance SA.

- **Credit card** payments will be debited immediately upon receipt of card details. Credit card payments will be subject to a surcharge of 4 % (incl. VAT) to cover commission charges.
- **Bank transfers** should be made to Academy & Finance SA; the bank details will be indicated on the invoice.

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, by the following dates end of business (Geneva):

- 12 April 2011 refund of 80%
- 27 April 2011 included: refund of 40%
- after 27 April 2011 no refund will be made for cancellation



Zurich - 11, 12 & 13 May 2011

REGISTRATION FORM

You can also register by telephone: + 41 (0)22 849 01 11

CONFERENCE & GALA DINNER

I register for the STEP Swiss European Annual Conference and I choose:

- Whole conference
 11 & 12 May
 12 & 13 May
 YES, I will be accompanied by ____ person(s) at the Gala Dinner on 12 May

ACCOMMODATION

- Please send me the Hotel Booking Form with preferential rates

 Yes, I am a member of STEP: membership N° _____
 Yes, I am a member of the BSCC: membership N° _____

Full name _____

Position _____

Company _____

Address _____

Postcode _____ City _____ Country _____

Tel _____ Fax _____

Mobile _____ E-mail _____

Special dietary requirements (if any) _____

PAYMENT

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.