

# IBSA

International Business  
Structuring Association

IBSA Workshop, 4 June 2015  
Squire Patton Boggs, London

## Developing Strategies for International Business: *Examining a Typical Entrepreneur's International Group Structure*

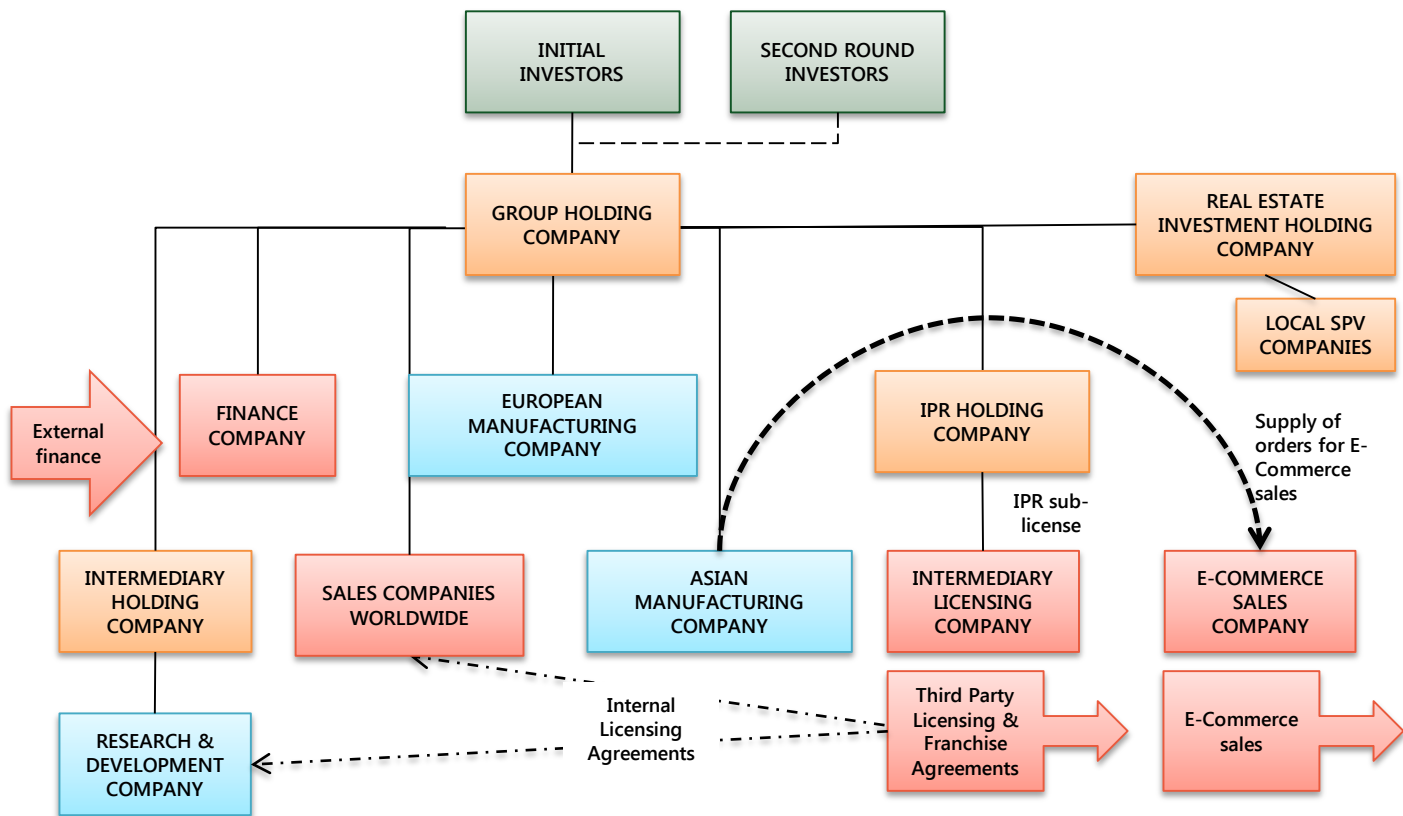


This workshop is for professionals interested in exploring the latest developments in international business structuring- in particular transfer pricing, tax policy issues and global business investment incentives. The workshop will be run by a group of internationally renowned experts, all involved in global business structuring issues as both practitioners and policy influencers.

Hosted by:

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## Examining a Typical Entrepreneur's International Group Structure



The workshop has been designed to encourage interaction amongst attendees, using the above typical international group structure as a case study to frame discussions throughout the day. Attendees will have the opportunity to share their own experiences with and learn from an international audience of their peers.

08:30	<b>Registration &amp; Housekeeping</b>
09:00	<b>Global Economic Outlook - Business</b> Close Brothers will provide a view of the current macro-economic climate, and the implications for international business structuring.
09:40	<b>Treaty Access Limitations</b> Roy Saunders, IFS Consultants <ul style="list-style-type: none"><li>• Principal purpose test and BEPS aims</li><li>• General treaty shopping limitations</li><li>• Qualified residence tests</li><li>• Future for international holding, financing and licensing companies</li></ul>
10:20	<b>Business Tax Incentives: Utilising Available Reliefs</b> Bern Gilbey, Squire Patton Boggs <ul style="list-style-type: none"><li>• EIS/VCT/Business Investment Relief</li><li>• Tax advantaged share incentive programmes</li><li>• Patent box &amp; R&amp;D tax credits</li><li>• State Aid issues</li></ul>
11:00	<b>Coffee Break</b>
11:30	<b>Transfer Pricing: Application of the Profit Split Method</b> Amanda Pletz and Dr Emmanuel Llinares, NERA Economic Consulting <ul style="list-style-type: none"><li>• Circumstances in which the use of the method is appropriate</li><li>• Implementation aspects</li><li>• Documentation</li><li>• Acceptability by tax authorities</li></ul>
12:30	<b>Keynote: The Post-UK-Election Landscape for SMEs with Global Interests</b> Philip Baker QC OBE, of Field Court Tax Chambers will discuss post-election issues affecting international business structures for UK SMEs with global interests.
13:00	<b>Lunch Break</b>
14:00	<b>Discussion Group 1 - Tax Incentives Framework</b> Building on from the morning's business incentives session, this discussion focusses on practical aspects around EIS and Business Investment Reliefs and how the raft of EU State Aid cases are likely to affect the landscape for future investments. Will the reliefs utilized by big business in the past have an adverse domino effect on the way small businesses must structure themselves in the future?
15:15	<b>Coffee Break</b>
15:40	<b>Discussion Group 2 - The OECD &amp; the New World Order</b> The OECD is confident it can produce meaningful actions out of the BEPS Project commissioned via G20, but can it reconcile with government policy decisions at a national level? CCCTB is back on the agenda in the EU, whilst the UK has already implemented the DPT. Will the US adopt OECD actions or continue with its own MTCs? The discussion looks at the practical implications of the BEPS Project progress and treaty access limitations.
17:00	<b>Event Close</b>



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# REGISTER

- + Online: [www.istructuring.com/branch-events](http://www.istructuring.com/branch-events)
- + Email: [jay.abai@istructuring.com](mailto:jay.abai@istructuring.com)
- + Call Jay on +44 (0) 20 7034 7074

## PRICING

IBSA Members	£199 + VAT
Non-Members	£399 + VAT

## DELEGATE INFORMATION – Please copy this form for multiple delegates

Salutation (Mr/Mrs/Ms)	First Name	Last Name
Company	Job Title	Address
Postcode/Zip	City	Country
Telephone (Direct)	Cell/Mobile (Direct)	Email (Direct)

## PAYMENT INFORMATION

I would like to pay by: ☐ Bank Transfer ☐ Invoice

### BANK TRANSFER PAYMENT: OUR BANK DETAILS

Bank Name	Barclays Bank PLC	BIC No		SWIFT Code	BARCGB22	
Sort Code	20-36-47	Account Number		Purchase Order Number		
Bank Address						
Signature					IBAN	GB60 BARC 2036 4733 6705 62

All bookings require a signature. By signing this document, you are agreeing to the cancellation policy set out in the terms and conditions below, and confirm you are authorised on behalf of the client to sign this document.

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