

Corporate International Tax Planning

Why attend this conference?

As a result of changing legislation and attitudes of world tax authorities it is imperative that you are completely up-to-date with the latest developments in corporate international tax. This timely conference will provide you with essential guidance enabling you to effectively navigate the complex field of the new **CFC regime**, the **foreign PE profits exemption rules**, the **new UK finance income and patent box legislation** and the **latest developments from the ECJ**. Expertly chaired by **David Campkin**, Group Tax Director at the **BBC** and featuring a multi-disciplinary panel of experts from industry and practice, this conference is indispensable for all those working within this dynamic field. It will also provide you with an unprecedented opportunity to network and bench-mark with your peers.

As a delegate at this must-attend event you'll leave with the skills and knowledge to:

- Apply the **new CFC legislation**
- Identify the opportunities arising from **ECJ case law** and likely areas for challenge
- Understand the **foreign PE profits exemption rules** and how they will work
- Analyse how the new **UK finance income and patent box** compares with its foreign equivalents
- Make the best use of **double tax treaties**
- Analyse impact of the proposed CCCTB Directive and other regulation proposals

Who should attend?

This conference has been specifically designed to address the needs of UK based companies and foreign groups operating in the UK and will be essential for:

- Heads of Tax
- International Tax Managers
- Tax Directors
- Solicitors
- Group Tax Managers
- Accountants

Sponsorship Opportunities

Promote your brand, showcase your expertise and meet new clients. Various sponsorship opportunities are available at this event. For more information contact **Ami Shah** on **020 7400 2501** or email ami.shah@lexisnexis.co.uk

Programme

Tuesday 28 February 2012

- 09.00 Registration and coffee
- 09.30 **Chairman's welcome and introduction**
David Campkin, Group Tax Director, BBC
- 09.35 **The new controlled foreign companies regime**
 - Background to CFC changes
 - The new regime – a brief outline
 - The new regime – improvements and opportunities
 - The new regime – a critique
 - business competitiveness
 - EU law compliance**Mark Persoff, Partner, Ernst & Young**
- 10.20 **The new UK patent box compared to other IP regimes**
 - How the UK patent box will work
 - Who will benefit?
 - How the UK compares with other IP regimes
 - Will it make a difference to UK competitiveness?**Ian Brimicombe, Head of Group Tax and Treasury, AstraZeneca**
- 11.05 **Question and answer session**
- 11.15 Morning refreshments
- 11.35 **Opportunities arising from the latest ECJ cases**
 - Recent decisions, including *National Grid Indus BV*
 - Opportunities
 - Likely areas for challenge and pending decisions**Roopa Aitken, Partner, Grant Thornton**
- 12.00 **Foreign permanent establishments profits exemption**
 - Background to the new rules
 - How does the exemption work?
 - The anti-diversion rule
 - Planning opportunities for multinationals
 - The full picture – dividend exemption, SSE, impact on SME behaviour**Erika Jupe, Partner, Osborne Clarke**

"A very interesting and wide ranging event! It was useful to hear numerous points of view of speakers and delegates."

Gordon Park, Invensys

13.05 Lunch

14.05 The Commission's proposed CCCTB Directive/the Franco-German CCTB: what does it all mean post the UK's veto?

- The contents of the 16/3/2011CCCTB Directive
- The Franco-German CCTB proposals
- The Euro-plus pact and CCTB
- The current political landscape and the Eurozone crisis
- Planning under either CCCTB or CCTB

Peter Cussons, International Corporate Tax Partner, PwC

14.50 Key developments in UK tax treaties

- Features of the latest treaties with China, Germany Hungary and others
- OECD developments on the meaning of Permanent Establishment
- Avoidance and treaty benefits
- Beneficial ownership –the latest

Jonathan Schwarz, Barrister, Temple Tax Chambers

15.35 Question and answer session

15.45 Afternoon refreshments

16.05 The use of tax as a regulatory tool

- Bank Payroll Tax and Bank Levy
- Financial Activities Tax
- Financial Transactions Tax
- The political dimension – can there ever be a strategy?
- Where do we stand and where are we going

Andrew Senior, Head of Tax, Rabobank

16.35 Final questions

16.40 Chairman's final conclusion

16.50 Close of conference

Post conference workshop:

Setting and Testing Royalties

Wednesday 29 February, Chancery Lane, London
8.30am registration for 9am start, 12 pm finish

www.conferencesandtraining.com/royalties

Lead by Wendy Nicholls, Partner and the Head of Transfer Pricing, Grant Thornton this half day workshop looks at the practical issues surrounding setting and testing royalties.

Topics covered will include:

- When is a royalty appropriate
- Finding royalty comparables
- Setting royalties
- Trade mark and other marketing intangibles
- Patents and other trade intangibles
- Worked case study examples

The specialised, highly practical focus to this workshop offers a valuable opportunity to get up to speed on this complex area.

This workshop is available to conference delegates from only £299! See back page for details.

Post conference workshop:

Patent Box Planning for IP

Wednesday 29 February, Chancery Lane, London
12.30pm registration for 1pm, 4 pm finish

www.conferencesandtraining.com/patentbox

Led by Anne Fairpo, Barrister at 13 Old Square and Atlas Chambers this half day workshop looks at the practical application of the Patent Box proposals

Topics include:

- Review of the draft legislation, considering:
 - getting in shape to claim the patent box
 - valuation: what, when and who?
 - documentation and other hurdles
 - is it worth claiming?
- Case studies to illustrate issues and opportunities

The highly practical workshop will focus on this changing and complex of legislation. Topics will address the legislation available at the time of running.

This workshop is available to conference delegates from only £299! See back page for details.

Pre-Conference Networking

All our delegates will be able to take advantage of our pre-conference online networking. Our system, Leebug, allows you to connect with other delegates, discuss and debate the issues, set up meetings and submit questions for the panels.

Registration

Corporate International Tax Planning

Tuesday 28 February 2012

Central London

Your priority booking code is:

WEB

You will need to quote this code to claim your early booking discount*

*The early booking discounts are only available when you register by the dates stated below.

Payment details

Conference only:

- £649 + VAT per delegate for bookings on or before 19 January 2011 – **SAVE £50**
- £699 + VAT per delegate for bookings after 19 January 2011

Conference and one workshop:

- £849 + VAT per delegate for bookings on or before 19 January 2011 – **SAVE £50**
- £899 + VAT per delegate for bookings after 19 January 2011
- Setting and testing royalties (AM)
- Patent box planning for IP (PM)

Conference and both workshops:

- £1049 + VAT per delegate for bookings on or before 19 January 2011 – **SAVE £50**

- £1099 + VAT per delegate for bookings after 19 January 2011

Workshop only:

- £249 + VAT per delegate for bookings on or before 19 January 2011 – **SAVE £50**
- £299 + VAT per delegate for bookings after 19 January 2011
- Setting and testing royalties (AM)
- Patent box planning for IP (PM)

Documentation only:

- £299 (zero VAT) documentation only

*Please note: discounts cannot be used in conjunction with one another.
You will need to quote your booking code to claim your discount

- Payment by cheque made payable to LexisNexis Payment by credit card

1st delegate details

Name
Job title
Email <small>(Please note we may need to send you information on venue changes by email)</small>
Tel
Additional requirements

2nd delegate details

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Job title
Email <small>(Please note we may need to send you information on venue changes by email)</small>
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Additional requirements

Address details

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I understand that this booking is subject to the cancellation terms set out on this registration form.

Authorised Signature
(all bookings must be signed)

Please return to: LexisNexis Conferences, Halsbury House, 35 Chancery Lane, London WC2A 1EL.

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Booking & Enquiries (please note we require written confirmation)

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Email registrations@lexisnexis.co.uk

Post LexisNexis Conferences, Halsbury House,
35 Chancery Lane, London WC2A 1EL

www.conferencesandtraining.com/corporate-international-tax

Sponsorship and exhibition opportunities

Enhance your brand and meet new clients

Take this excellent opportunity to position your organisation at the forefront of the market. This conference will provide an excellent platform to raise your organisation's profile in front of key industry participants and showcase your expertise and services as the pre-eminent organisation in the field.

To find out more about the range of opportunities available, please contact Ami Shah on 020 7400 2501 or email ami.shah@lexisnexis.co.uk

Forthcoming Events

Should you require any further information on any of the events below, please tick the appropriate box and return to LexisNexis.

Employment Tax Forum – 29 February 2012

VAT in 2012 – 8 March 2012

CFC Reform – 17 April 2012

For more information visit www.conferencesandtraining.com

You can still benefit from the day's event if you can't make it!

Naturally, nothing matches the experience of coming to the conference, but if you really can't make it, you can still benefit by ordering a set of course papers. Available for £299, this will give you a permanent record of the subjects covered, which you can share with your colleagues.

To order call on +44 (0)20 7347 3574 or return the booking form.



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Delegates will receive hard copy papers and free USB stick

Administration

VENUE
Central London

FEE
Your one-day fee includes attendance, refreshments, lunch and course documentation. Full payment, including VAT must be received prior to the conference. Please post a cheque for the full amount with your completed registration form or tick the payment by credit card box and we will call you to obtain card details. Once payment has been received a VAT invoice/receipt will be issued.

OUR CONFIRMATION OF YOUR BOOKING
All bookings will be acknowledged in writing within five working days of receipt and joining instructions (final conference details and a venue location map) will be emailed to delegates approximately two weeks before the event. Please telephone the Bookings Enquiries line immediately:
• if you have not received written acknowledgement of your booking within 7 days of sending it by fax, post or email or
• if you have not received your joining instructions five days before the event

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Email: lexisnexis@venuehunt.co.uk
Quote the code VHLEX at the time of booking.

ADDITIONAL REQUIREMENTS
LexisNexis Conferences would like to ensure that all delegates can participate fully at our events. If you have any additional requirements, eg. wheelchair access, large print documentation or an induction loop, or if you have any particular dietary requirements please let us know on the adjacent form.

Please call me to discuss my requirements in more detail.

CERTIFICATE OF ATTENDANCE
A certificate of attendance is available on request, following your attendance at this conference, as a record of your training and development.

DOCUMENTATION SALE
Your notes will be dispatched within five working days after the event. Please call us if you do not receive your notes by two weeks after the event.

CANCELLATIONS
A refund of fees will be made only for cancellations received in writing at least 14 days before the event (less a 25% cancellation fee to cover administration costs). No refunds will be made for cancellations received within 14 days of the event and failure to attend after confirming a booking will be subject to the same terms. We regret that the transfer of a booking to another event cannot be made but a substitute delegate will be accepted at any time before the event.

This programme is correct at the time of going to press. However, we reserve the right to alter or cancel the programme due to circumstances beyond our control.

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