



# Fund structuring in practice: tax considerations

29 October 2025, London

Hyatt Regency Blackfriars  
19 New Bridge St  
London EC4V 6DB  
UK



academy@inrev.org  
+31 (0)20 235 86 02  
www.inrev.org

08:30

## Registration and welcome coffee

09:00

## Welcome and course introduction

- Participants introduction
- Course objectives
- Fundamentals of fund structuring

Richard van der Linden, Tax Partner, PwC (course leader)

09:45

## Technical tax considerations in fund structuring

- Distributions and withholding tax
- Substance
- Access to tax treaties

Antoine Dupuis, Partner, International and Corporate Tax, Atoz

10:45

## Coffee break

11:15

## Key principles of the hybrid mismatch rules

- Fundamentals of the hybrid mismatch rules
- Impact on fund & investment structuring
- Fund documentation

Friederike Werner, Head of Product Development Alternatives, DWS



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12:00

## AI tooling to boost your tax structuring

- AI DD assistance
- Documentation management
- Compliance

Richard van der Linden

12:30

## Lunch

13:45

## Practical examples of fund structuring

- Practical examples of fund structures
- Common tax challenges when structuring a fund
- Fund documentation – how do tax rules impact the drafting of the fund documentation

Antoine Dupuis  
Friederike Werner

14:45

## Case study including coffee break

Multiple speakers

16:45

## Course wrap-up by course leader

17:00

## End