



Fund structuring: tax considerations course

18 November 2026, London

Nuveen Real Estate
201 Bishopsgate
London EC2M 3BN
United Kingdom

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Participants are expected to arrange their own travel and accommodation.

08:30 **Registration and welcome coffee**

09:00 **Welcome and course introduction**

- Participants introduction
- Course objectives
- Fundamentals of fund structuring

Richard van der Linden, Senior Director Capital Structuring, URBZ Capital (course leader)

09:45 **Technical tax considerations in fund structuring**

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

Christina Leomy-Voigt, 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 and investment structuring
- Fund documentation

Friederike Werner, Head of Product Development Alternatives, DWS



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12:00	Discussion on AI tooling to boost your tax structuring Richard van der Linden
12:30	Lunch
13:45	Practical examples and common challenges • Practical examples of fund structures • Common tax challenges when structuring a fund <i>Speaker to be confirmed</i>
14:45	Case study discussion (including coffee break)
16:45	Wrap-up Richard van der Linden
17:00	End