



Fund structuring in practice: tax considerations

16 – 19 January 2024, online

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

Monday 15 January

11:00 CET **Participants introduction call by INREV**

Tuesday 16 January

10:00 CET **Welcome and course introduction**

- Course objectives
- Fundamentals of fund structuring

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

10:45 CET **Coffee break**

11:00 CET **Technical tax considerations in fund structuring**

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

Antoine Dupuis, Partner, International and Corporate Tax, Atoz

12:00 CET **End**



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Wednesday 17 January

- 10:00 CET **Hybrid mismatch rules**
- Fundamentals of the hybrid mismatch rules
 - Impact on fund & investment structuring
 - Fund documentation

Friederike Werner, Head of Product Development Alternatives, DWS

11:00 CET **Coffee break**

- 11:15 CET **The INREV Code of tax conduct and CSRD reporting**
- Panel discussion moderated by Richard van der Linden, Tax Partner, PwC
- Abbas Suleiman, Senior Director Structured Finance, Invesco Real Estate
 - Anne-Sophie Le Bris, Senior Manager, Deloitte
 - Nina Grunow-Jensen, Head of Transactions and Tax, P+

12:15 CET **Case study preparation**

Richard van der Linden, Tax Partner, PwC

12:30 CET **End**



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Friday 19 January

10:00 CET

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

Gwen Hassert, Global Head of Tax, UBS

11:00 CET

Coffee break

11:15 CET

Case study

Multiple speakers

12:45 CET

Course wrap-up

Richard van der Linden, Tax Partner, PwC

13:00 CET

End