



Fundamentals of Fund Structuring: Tax and Regulatory Considerations

7 November, Paris 2018

08:45	Registration		11:30	Fund structuring – practical examples Factors influencing choice of structure	Richard van der Linden Prologis
09:00	Introduction <ul style="list-style-type: none">• Introduction of attendees• Course objectives• General introduction: terminology basic tax and legal entities and terms sheet	Jens Chr. Britze EY		<ul style="list-style-type: none">• Practical tax aspects of RE fund structuring• AIFMD and tax structuring implications• Managing tax risks	
09:30	Regulatory challenges for structuring <ul style="list-style-type: none">• Impact of AIFMD on fund structuring• MiFID II and structures outside AIFMD• BEPS, ATAD and the evolving European tax environment• Planning for the post-Brexit world	Jeff Rupp INREV	12:30	Lunch	
10:15	Fund structuring – Technical tax considerations <ul style="list-style-type: none">• Investor considerations: getting the right structure for the return• Fund level considerations: how to structure for the widest audience• Asset/intermediary level: buying the assets and returning income and capital• Implications for Fund Managers	Carsten Bödecker bepartners	13:30	Hybrid mismatch rules in ATAD <ul style="list-style-type: none">• Impact on fund structuring for managers• Impact on fund structuring for investors• Practical implementation examples	Friederike Werner DWS
11:15	Coffee Break		14:00	Governance framework and legal issues <ul style="list-style-type: none">• Key legal considerations• The document suite• Common fund terms• Ancillary documents	Samantha Lake Coghlan Goodwin
			14:45	Coffee break	
			15:00	Case study	Suzana Guzu Atoz
			16:30	Wrap up	
			16:45	End	Jens Chr. Britze EY