

SESSIONS

REGULATORY AND TAX ISSUES FOR FUNDS - 07/11/
2023

Regulatory and Tax Issues for Private Equity
Funds

7 November 2023

London, UK

Registration & Refreshments

08:30 - 09:00

Main Conference Stage

Opening Remarks & Welcome

09:00 - 09:10

Main Conference Stage

Participants

Jenny Wheeler - International Counsel, DEBEVOISE &
PLIMPTON LLP

Keynote Interview with the HMRC

09:10 - 09:30

Main Conference Stage

EU Regulatory Landscape for Private Equity Funds

09:30 - 10:05

Main Conference Stage

- Evolving regulatory challenges for private equity funds in the UK and EU
- Discussion on recent regulatory developments and potential future changes

Private Equity: Legal, Regulatory and Compliance Risks

10:05 - 10:40

Main Conference Stage

Participants

Richard Taylor - Head of Tax, BROCKWELL CAPITAL
LIMITED

Morning Coffee Break

10:40 - 11:00

Main Conference Stage

Advisor panel: Comparison of Different AHC Regimes

11:00 - 11:30

Main Conference Stage

- Insights into due diligence requirements and best practices for private equity fund managers
- Importance of ESG factors in the investment decision-making process
- Mitigating risks arising from legal, regulatory, and compliance obligations
- What to expect next?

Sustainable Finance Disclosure Regulation: Navigating Level II and SFDR RTS in Practice

11:30 - 12:10

Main Conference Stage

- Impact of SFDR for Private Equity funds and managers
- How ESG factors are integrated at both an entity and product level
- What are the expectations for general partners?

Lunch Break & Networking

12:10 - 12:55

Main Conference Stage

Taxation of Carried Interest: Current State of Play and Future Outlook

12:55 - 13:30

Main Conference Stage

- UK carried interest taxation – an overview (including DIMF and income based carried interest – “IBCI”); The judicial review challenge
- Potential for reform
- US issues and update (including “103KE” election introduction)

Participants

Farhana Raval - EMEA Head of Tax, DAVIDSON
KEMPNER

Industry Panel: Handling Other Practical Issues

13:30 - 14:05

Main Conference Stage

- Analysis of tax considerations and implications for private equity funds operating in the UK and EU
- Discussion on tax structuring, tax optimization strategies, and relevant tax regimes across member states
- The disguised investment management fee
- Income based carried interest
- Impact of the EU Anti-Tax Avoidance Directive (ATAD) on private equity funds

Afternoon Coffee Break & Networking

14:05 - 14:30

Main Conference Stage

Fund Structuring for PE: Tax Compliance Challenges

14:30 - 15:10

Main Conference Stage

UK Asset Holding Company Regime

15:10 - 15:45

Main Conference Stage

- Changes since introduction of regime
- Practical developments and observations
- Ongoing challenges

BEPS Pillar 2: Impact for PE Fund Managers

15:45 - 16:25

Main Conference Stage

- Overview of Pillar 2
- Key considerations for funds and Pillar 2
- The UK rules – important differences between UK law and the OECD model
- Challenges and next steps

Tales from the Coal Face – Industry Perspectives

16:25 - 17:00

Main Conference Stage

Participants

Jill Hardie - Head of Tax (EMEA) – Private Equity,
ABRDN PLC

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**Future Trends and Outlook for PE Funds in the
EU and UK**

17:00 - 17:30
Main Conference Stage

Chair's Key Takeaways and Closing Remarks

17:30 - 17:40
Main Conference Stage

Participants

Jenny Wheater - International Counsel, DEBEVOISE &
PLIMPTON LLP

SCHEDULE

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15:00	15:10 - UK Asset Holding Company Regime 15:45 - BEPS Pillar 2: Impact for PE Fund Managers
16:00	16:25 - Tales from the Coal Face – Industry Perspectives
17:00	17:00 - Future Trends and Outlook for PE Funds in the EU and UK 17:30 - Chair's Key Takeaways and Closing Remarks