

Registration & Refreshments

08:30 - 09:00

Main Conference Stage

Opening Remarks & Welcome

09:00 - 09:05

Main Conference Stage

Participants

Jenny Wheeler - International Counsel, DEBEVOISE & PLIMPTON LLP

Keynote Interview with HMRC

09:05 - 09:25

Main Conference Stage

EU Regulatory Landscape for Private Equity Funds

09:25 - 09:55

Main Conference Stage

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

Participants

Richard Taylor - Head of Tax, BROCKWELL CAPITAL LIMITED

Private Equity: Legal, Regulatory and Compliance Risks

09:55 - 10:25

Main Conference Stage

- Insights into due diligence requirements and best practices for private equity fund managers
- Mitigating risks arising from legal, regulatory, and compliance obligations
- What to expect next?

EU Developments: What are Various Initiatives Impacting PE Funds?

10:25 - 10:55

Main Conference Stage

- What stage are they at and do they matter to PE Funds?
 - EU Anti-Tax Avoidance Directive (ATAD) on private equity funds
 - Council directive on Faster and Safer Relief of excess withholding taxes (FASTER)
 - Impact of EU directive DEBRA on M&A
 - Tax measures against uncooperative jurisdictions
- UK carried interest taxation – an update

Morning Coffee Break

10:55 - 11:20

Main Conference Stage

New Tax Challenges in the UK

11:20 - 11:50

Main Conference Stage

- Understanding the evolving tax treatment of management fees & realised gains
- Salaried member rules review: Impact of HMRC guidance and recent case law
- Mixed member rules – new case law and related issues
- Miscellaneous income – further case law and potential scope
- Permanent establishment changes and use of IME
- Basis period reform

BEPS Pillar 2: Impact for PE Fund Managers

11:50 - 12:20

Main Conference Stage

- Key points of impact for investment fund structure
 - Current pitfalls in the implementation of BEPS Pillar 2 for PE fund managers
- Fund and holding company exceptions – UK and Model Rules distinctions
- Potential risks created by specific investors and structures
- Side and subscription document provisions – developing market norms

Tales from the Coal Face – Industry Perspectives on Common Tax Challenges for PE fund managers

12:20 - 12:50

Main Conference Stage

- Tax challenges for LPs: Investing vs trading across the EU
- Substance and beneficial ownership challenges on structuring entities
- How to cope with constant reforms while planning due diligence
- Navigating conditional withholding tax on dividends and opaque vs transparent debate in the EU

Participants

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

Joanna Linfield - Tax Professional, TRITON PARTNERS

Argy Portokalaki - Tax Structuring, HARBOURVEST

Farhana Raval - EMEA Head of Tax, DAVIDSON KEMPNER

Tax Compliance Challenges and Global Mobility of Fund Executives

12:50 - 13:20

Main Conference Stage

- Carry regimes in the EU – France, Germany, Italy and Spain
- Current UK regime and potential changes - could Labour learn from the EU options or will there be a mere rate change or something else?
- Abolition of non-dom rules and implications
- Alternative residence jurisdictions – Italy, Spain etc
- Wider implications of moves from the UK – e.g. on QAHCS
- What are the issues US high-net-worth individuals facing?

Participants

William Fogarty - Partner, MAPLES

Lunch Break & Networking

13:20 - 14:20

Main Conference Stage

Navigating the Acquisitions and Change in Control Regime

14:20 - 14:50

Main Conference Stage

- What are the changes in the "Change in Control" processes?
- What can be the consequences of the change in control failure?
- Outcome of the February consultation regarding the recent changes

The VAT And Sales Tax Treatment of Fund Management

14:50 - 15:20

Main Conference Stage

- Latest VAT updates and impact for PE fund management
- E-invoicing and digital reporting of VAT
- Managing evidence and mastering the document chain
- Dealing with the questions of tax authorities and maintaining consistency
- Achieving efficient and consistent documentation to avoid audits

Afternoon Coffee Break & Networking

15:20 - 15:45

Main Conference Stage

Investment Firms Prudential Regime: The ICARA

15:45 - 16:15

Main Conference Stage

- Common challenges and pitfalls in implementing the ICARA
- Decoding IFPR: Expert guidance for meeting compliance requirements

Managing ESG reporting for PE funds

16:15 - 16:45

Main Conference Stage

- Best practice strategies in ESG reporting and its impact on tax for PE fund managers
- Recognising what is sustainable and what is not and avoiding penalties
- Role of ESG and taxation in PE world
- What does the future look like in the new more ESG regulated world?

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

16:45 - 17:15

Main Conference Stage

Chair's Key Takeaways and Closing Remarks

17:15 - 17:20

Main Conference Stage

Participants

Jenny Wheeler - International Counsel, DEBEVOISE & PLIMPTON LLP

SCHEDULE

2024 AGENDA - 06/06/2024

Regulatory and Tax Issues for Private Equity Funds

6 June 2024

London, UK

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