

Invitation to a Professional Seminar:

# **Czech Republic – Austria – Liechtenstein:**

# Structuring via three countries with Foundations, Trusts and similar vehicles

Hotel Paris Prague Friday, 29 March 2019, 10.00 – 12.30 hrs



We are very pleased to invite you to a Professional Seminar:

# Czech Republic – Austria – Liechtenstein: Structuring via three countries with Foundations, Trusts and similar vehicles

## **Speakers**

This Professional Seminar will be conducted by the following specialists:

• Hansjörg Wehrle

<u>Background</u>: Lawyer (DE), Specialist in Tax Law (DE) LL.M. (International Taxation), Member of the Executive Committee, Allgemeines Treuunternehmen, Vaduz, Liechtenstein

#### • Dr. Franz Althuber

<u>Background</u>: Founding partner of ASP Althuber Spornberger & Partners, an Austrian law firm specialized on tax disputes and tax criminal law; adjunct professor for tax criminal law at the University of Vienna, Austria

#### • Mag. Dr. Dimitar Hristov

<u>Background:</u> Partner and Head of Tax, attorney-at-law with completed tax advisor education, DLA Piper Weiss-Tessbach Rechtsanwälte GmbH, Vienna, Austria

#### • Dr. Ondrej Trubac and Mgr. Tomas Hokr

<u>Background</u>: Partner of Bříza & Trubač, attorneys-at-law, a Prague-based Czech law firm specialized on trans-border commercial litigation, tax disputes and criminal tax law

## Date / Venue

The Seminar will take place on **Friday, 29 March 2019**, from 10.00 - 12.30 hrs at the

### **Hotel Paris Prague**

(Salon Violet) U Obecního domu 1 110 00 Prague 1

starting a 10.15 hrs with the presentations of the specialists mentioned above. Following these presentations, we will be delighted to invite you for a short lunch, where we will be at your entire disposal for a personal interview.

## Registration

Please use the registration form at the end of this invitation.

## Programme

### Hansjörg Wehrle:

- First experiences with the double tax treaty between Liechtenstein and the Czech Republic
- Wealth preservation structuring with Liechtenstein vehicles
- New transparency rules:
  - Automatic exchange of information
  - o Beneficial owner register

### Mag. Dr. Dimitar Hristov:

- Investments in Austria the correct legal form from a corporate and tax perspective
- The Austrian Foundation ("Privatstiftung") corporate and tax overview
- Compliance issues for investments in Austria (anti-money-laundering rules; register of economic beneficial ownership; automatic exchange of information; notification obligation for aggressive tax structuring)
- Practical tax structuring cases with Austria

## Dr. Ondrej Trubac / Mag. Tomas Hokr:

- General business and regulatory environment in the Czech Republic (especially taxation, anti-money laundering and criminal tax law aspects)
- A practical perspective of tax procedure in the Czech Republic, major tax risks and how to avoid them
- Potential criminal liability and other risks for directors and officers of Czech entities
- New beneficial owner register of Czech entities

## Dr. Franz Althuber:

- Doing business in Austria registration obligations from a tax perspective and liability risks
- Minimising tax risks in Austria advance rulings and their impact on personal liability
- Cross-border enforcement of decisions issued by Austrian tax authorities
- Risks of directors & officers of Austrian entities

## **Registration form**

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□ I would like to register for the Seminar

□ I am unable to attend, kindly send me the documentation

Name/first name:
Name/first name accompanying person:
Company:
Function:
Address/postal code/city:
Phone/e-mail:

We kindly ask you to return this registration form until **25 March 2019** by e-mail to marketing@atu.li.

We very much look forward to welcome you to our event!

## Room for your questions !

If you have any questions that should be dealt with during or after our presentations in Prague, please feel free to send them to us beforehand, together with your registration form. You may also send us your questions by e-mail at info@atu.li.

My questions:


#### Update to our privacy policy

Because the security of your data is important to us, we would like to inform you of our new privacy policy, which has been updated to bring it in line with the General Data Protection Regulation (GDPR) of 25 May 2018. The updated version contains a clear and detailed description of which data we record and for what purpose, how we use these data and how you can control the way we use these data. As of now, all your data will be stored according to the requirements of the GDPR.

Our privacy policy is available to view at any time at <u>www.atu.li/en/disclaimer.aspx</u>. Should you have any further questions, please do not hesitate to contact us by sending an e-mail to <u>datenschutzbeauftragter@atu.li</u> or calling +423 237 34 34.

If you no longer wish to receive our messages, you can inform us at any time by sending an e-mail to <u>marketing@atu.li</u>. We will then delete your data immediately.

Thank you for placing your trust in us.

11.02.2019