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Full day Conference

## **ATAD 2: impacts & challenges**

Meetings, Translations & Incentives Services S.A.  
3, rue des Carrefours  
L-8015 Strassen

Tél.: 459945-1 Fax: 459945-210  
Email: [meetincs@meetincs.lu](mailto:meetincs@meetincs.lu)

**Hôtel Le Royal - Luxembourg**  
**Wednesday, October 23, 2019**

On 8 August 2019, the Luxembourg legislator released the draft law implementing EU Directive 2017/952 of 29 May 2017 (the "Anti-Tax Avoidance Directive 2" or "ATAD 2"). This measure builds on the extensive work done over the past two years to tackle corporate tax avoidance and ensure fair and effective taxation in the EU. ATAD 2 will ensure that hybrid mismatches of all types cannot be used to avoid tax in the EU, even where the arrangements involve third countries. The new rules will come into force on January 1, 2020. The application of these provisions is expected to have effects on private equity or real estate funds. Taxpayers and their service providers will have to assess impact on existing investment structures, detect potential hybrid mismatches and where necessary, implement structure alignments before year-end. This conference aims at providing participants with a comprehensive overview of the new rules and how they may impact Alternative Investments and multinational groups in Luxembourg

## WHO IS THE ORGANIZER?

MEETINCS S.A. is a company active in the organization of conferences, congresses and events founded in 1996.

MEETINCS organizes many conferences that bring together recognized international experts.

The conferences cover topics in various fields, ranging from real estate to tax, as well as national news topics.

Continuing professional training company:  
Approval No. 79234 A

Accreditation of the Luxembourg Bar

## MISCELLANEOUS

The presentations will be held in English. Simultaneous translation into French will be provided.

A documentation using the text of the presentations and/or copy of the slides available, will be distributed at the beginning of the conference.

A certificate of participation will be issued to participants who attended the whole conference.

## TARGET AUDIENCE

General management of banks  
& large companies  
Heads of Tax Department  
Trustees  
Private Banking Managers  
Internal Audit Managers  
Tax advisors  
Company lawyers  
Lawyers  
Company consultants,...

## HOW TO REGISTER?

By returning the registration form attached to our address

MEETINCS S.A.

3, rue des Carrefours | L-8015 Strassen

by telecopy : (+352) 459945-210

or online at [www.meetincs.lu](http://www.meetincs.lu)

Registration deadline:

October 22, 2019

## REGISTRATION FEE

595,00 € excl. of VAT 3%

5 % discount for registrations received before October 7, 2019.

By registering a minimum of two people you will be entitled to a 5% discount on the registration fee and this, from the first registered person.

These offers can be combined!

## SUBSTITUTION - CANCELLATION

(Excerpt from our GTC - full version to be downloaded on [www.meetincs.lu/conferences/conditions](http://www.meetincs.lu/conferences/conditions))

If after your registration, you are not able to attend the conference, you can be replaced free of charge by at any time by one and same person from your company.

You will have to inform the organizer before the beginning of the meeting. Wearing of the name tag is mandatory for access to the conference room

Any cancellation of registration must be made in writing at least five working days (October 15, 2019) before the meeting and will be invoiced 100€ excl. of VAT for administrative costs.

Past this deadline, the registration fees will remain due in full.

## PROGRAM

Simultaneous translation: English <> French

- 08h15 Registration & Welcome coffee
- 09h00 Opening of the conference by the President of the conference  
*Mr André Vasanne, MEETINCS S.A.*  
*Moderator of the day – Laurent Engel, Tax partner - FICEL Group*
- 09h15 **ATAD 2 for starters: Key concepts and provisions**  
*Mr Daniel Riedel, Senior Associate - BSP*
- 10h05 **A focus on the financial instruments rule:**  
**How to identify the situations in scope ?**  
**What are the links with the multiplication of tax credits (cum-ex situations)?**  
**Which are the carve-outs?**  
*Mr Laurent Engel, Tax Partner - FICEL Group*
- 10h55 Coffee break
- 11h15 **A focus on the hybrid entity rules**  
*Mrs Johanna Tschurtschenthaler, Senior Associate – Allen & Overy*
- 12h05 Déjeuner-Networking 1ere partie
- 14h00 **Case studies – what is the impact of the bill and how to prepare?**  
**PE/RE investment funds – insights into the new business landscape:**  
**'acting together', reverse hybrids, ...**  
*Mrs Sandrine Degève, Head of Tax Technical Team - KPMG Luxembourg*
- 14h50 Coffee break
- 15h10 **Case studies – what is the impact of the bill and how to prepare?**  
**Corporates and multinationals – Assessing the risks in a waterfall of complex situations**  
*Mrs Laetitia Borucki, Counsel – AKD Luxembourg*
- 16h00 **How to put it into practice (panel)**  
*Mrs Laetitia Borucki, Mrs Sandrine Degève, Mr Daniel Riedel, Mrs Johanna Tschurtschenthaler and as special guests : Mrs Flora Castellani - UEL, Mr Giuliano Bidoli, Company Director - BC Partners*
- 17h00 End of the conference

Each presentation will be followed by a question and answer session

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# Registration Form

## ATAD 2: impacts & challenges

Hôtel Le Royal - Luxembourg  
Wednesday, October 23, 2019

To send to :  
MEETINCS SA  
3, rue des Carrefours  
L-8015 Strassen  
Fax : 00352 459945-210  
Email : conferences@meetincs.lu

We note that the above data will be stored by MEETINCS SA in the form of a computer database, necessary for the proper management of our registration(s). By checking the box behind the specified email address, you will agree that it may be used to send you invitations to our upcoming conferences and our newsletter. Please note that if you are already in our database you will need to unsubscribe on the link at the bottom of each email transmission. Thank you!

Company: .....

Address: .....P.O. Box: .....

Zip Code: .....City: .....VAT number: .....

### Data on persons to be registered for the October 23rd, 2019 conference

1. Name: .....Firstname: .....

Tel.: .....Telecopy: .....

Email: .....@ .....Mailing ☐

☐ will not attend the lunch ☐ Vegetarian ☐ Allergies : .....

2. Name: .....Firstname: .....

Tel.: .....Telecopy: .....

Email: .....@ .....Mailing ☐

☐ will not attend the lunch ☐ Vegetarian ☐ Allergies : .....

3. Name: .....Firstname: .....

Tel.: .....Telecopy: .....

Email: .....@ .....Mailing ☐

☐ will not attend the lunch ☐ Vegetarian ☐ Allergies : .....

Please send a confirmation of registration and the corresponding invoice(s) to the person(s) registered. We confirm that we have noted the cancellation and/or replacement conditions included in the program and on the website "www.meetincs.lu/conferences/conditions".

....., 2019

.....  
Authorized signature(s)

If you would like the correspondence or billing to be sent to a person or department other than the above, please indicate this below:

C/O : .....

Email : .....Mailing ☐

Address: .....

Zip Code: ..... City: .....