

Monday, 1 March 2021 – 4:00 p.m. – 5:30 p.m. CET

1. Global and regional Private Equity topics

This webinar will cover current Private Equity related M&A Tax topics for investments in particular Germany, France, Austria, Luxemburg and Central and Eastern Europe

Schedule	Time	Agenda	Speaker
Plenary	4:00 – 4:45	Welcome & Introduction Global and regional private equity topics	Marcus Roth Brian Pinto Marc Rauner
Break-outs 2 runs á 20-25 minutes	4:45 – 5:30	Germany: <ul style="list-style-type: none">Imported Hybrid Mismatch through structured arrangements on Luxembourg Holding structures France: <ul style="list-style-type: none">Hot topics: capital gain taxation, ATAD II, DAC6, evolution of litigations re. financial expenses deduction Austria: <ul style="list-style-type: none">New interest limitation rules and other current topics related to leverage; update on repatriation matters and dividend withholding tax relief. Luxembourg: <ul style="list-style-type: none">Luxembourg Repatriation strategies in an ATAD II environmentAIF structures: important VAT considerations in light of recent CJEU decisions CEE: <ul style="list-style-type: none">DAC6 implementation in Central and Eastern Europe (?)	Germany: <ul style="list-style-type: none">Nevin Borucu, Vanessa Vandaele France: <ul style="list-style-type: none">Arnaud Mourier, Olivier Venzal, Eric Couderc Austria: <ul style="list-style-type: none">Michael Weismann, Peter-Michael Grau Luxembourg: <ul style="list-style-type: none">Raphaël LouageCédric Tussiot, Tomas Papousek CEE: <ul style="list-style-type: none">Gabriella Kocsis

Tuesday, 2 March 2021 – 4:00 p.m. – 5:30 p.m. CET

2. Real Estate and Debt Funds: Market Update

This webinar will cover the latest tax developments for the increased role of real estate and debt funds in Europe.

Schedule	Time	Agenda	Speaker
Plenary	4:00 – 4:45	Real Estate and Debt Funds: Market Update	Nevin Borucu Richard Beaumont Aleksander Kot Sarvi Keyhani
Break-outs 2 runs á 20-25 minutes	4:45 – 5:30	Germany: <ul style="list-style-type: none">• RETT Reform with a focus on the “New Shareholder Rule” and future RETT blockers possibilities• Fiscal authorities re-open new options for RETT-exempt intra-group restructurings• German Investment Tax Considerations: Developments and Trends Luxembourg: <ul style="list-style-type: none">• Tax structuring concerns for open ended RE and Infra AIFs• AIF structures: important VAT considerations in light of recent CJEU decisions• Business model of the private debt in light of current/future challenges• Wave of onshorisation in Asia : structuring considerations and typical alternative set-up for RE managers France: <ul style="list-style-type: none">• Current trends in the structuring of French RE deals CEE: <ul style="list-style-type: none">• Real Estate investment structuring in Central and Eastern Europe	Germany: <ul style="list-style-type: none">• Nevin Borucu• Andrea Bilitewski• Alexander Wenzel Luxembourg: <ul style="list-style-type: none">• Francisco Da Cunha, Joao Almeida• Cédric Tussiot, Tomas Papousek• Benjamin Toussaint, Clemens Petersen, Oliver Venzal• Yves Knel, Cedric Carnoye France: <ul style="list-style-type: none">• Sarvi Keyhani CEE: <ul style="list-style-type: none">• Aleksander Kot

Wednesday, 3 March 2021 – 4:00 p.m. – 5:30 p.m. CET

3. Developments in Structuring of Funds

This webinar will cover the latest global and regional tax developments in structuring of funds and structuring of MEP programs.

Schedule	Time	Agenda	Speaker
Plenary	4:00 – 4:45	Developments in Structuring of Funds	Francisco Da Cunha Christian Röpke Alexis Fillinger
Break-outs 2 runs á 20-25 minutes	4:45 – 5:30	France: <ul style="list-style-type: none">• Management investment’s environment and trends in French deals. Germany: <ul style="list-style-type: none">• Dividend Withholding Tax: Draft Act for stricter anti-abuse tests backing the Anti Treaty Shopping Rules• Reduction of ETR through interest deduction: tightening of tax audit practice on interest rates and Germany TP practice Luxembourg: <ul style="list-style-type: none">• Debt pushdown under TP angle: debt capacity and yield pricing• Holding companies and VAT : Navigating the puzzle of the CJEU jurisprudence• Impact of the investment strategy on the income classification at the level of the platform	France: <ul style="list-style-type: none">• Alexis Fillinger Germany: <ul style="list-style-type: none">• Nevin Borucu• Felix Ebeling, Nik Nolden Luxembourg: <ul style="list-style-type: none">• Balazs Majoros• Cedric Tussiot, Tomas Papousek, Berenger Richard, Marcus Sauer• Benjamin Toussaint, Philippe Lenges

Thursday, 4 March 2021 – 4:00 p.m. – 5:30 p.m. CET

4. Trends and Future of Corporate M&A

This webinar will cover the latest trends and provides an outlook in corporate M&A Tax.

Schedule	Time	Agenda	Speaker
Plenary	4:00 – 4:45	Trends and future of Corporate M&A	Andrea Bilitewski Arnaud Mourier Cecile Debin
Break-outs 2 runs á 20- 25 minutes	4:45 – 5:30	Germany: <ul style="list-style-type: none">• W&I Insurance update for investments in Germany• German tax reforms in light of international investments• Corporate: Carve out structures and challenges France: <ul style="list-style-type: none">• Hot topics: Interest limitations, VAT grouping and other trends Luxembourg: <ul style="list-style-type: none">• Corporate M&A transactions in light of the Biden tax policy CEE: <ul style="list-style-type: none">• Tax deductibility of interest and acquisition financing after ATAD Austria: <ul style="list-style-type: none">• New interest limitation rules and other current topics related to leverage; update on repatriation matters and dividend withholding tax relief	Germany: <ul style="list-style-type: none">• Andrea Bilitewski• Stefan Berg• Stella Posnak France: <ul style="list-style-type: none">• Arnaud Mourier, Olivier Venzal, Bertrand Jeannin Luxembourg: <ul style="list-style-type: none">• Christian Bednarczyk CEE: <ul style="list-style-type: none">• Adrian Hammer Austria: <ul style="list-style-type: none">• Michael Weismann, Peter-Michael Grau

Friday, 5 March 2021 – 4:00 p.m. – 5:30 p.m. CET

5. Technology and digital trends in M&A Tax

This webinar will cover the latest technology and digital trends for M&A Tax practitioners.

Schedule	Time	Agenda	Speaker
Plenary	4:00 – 4:45	Technology and digital trends in M&A Tax	Dany Teillant Miroslav Svoboda
Break-outs 2 runs á 20- 25 minutes	4:45 – 5:30	Luxembourg: <ul style="list-style-type: none">Digitalization of Tax : indirect tax leading the way (FAIA/SAF-T) France: <ul style="list-style-type: none">Take control and monitor tax positions in all your investments through a single digital platform Germany: <ul style="list-style-type: none">M&A Tax Structuring Tool: Outlook on future structuring perspectives CEE: <ul style="list-style-type: none">Data analytics tools in practice and dividend withholding tax relief	Luxembourg: <ul style="list-style-type: none">Cédric Tussiot, Vanessa Irigoyen, Benjamin Oesterling, Verena Gabler, Piotr Baranski France: <ul style="list-style-type: none">Thierry Morgant Germany: <ul style="list-style-type: none">Matthias Glossner, Nina Fensch CEE: <ul style="list-style-type: none">Miroslav Svoboda